Appendix B

Appendix B

Proponents' Plan of Development Supplement

Plan of Development Supplement

Gateway West Transmission Line Project

Segments 8 and 9

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APPENDICES

Appendix A Location Maps
Appendix B Morley Nelson Snake River Birds of Prey National Conservation Area DRAFT Mitigation and Enhancement Portfolio Proposal

ACRONYMS AND ABBREVIATIONS

BLM	U.S. Department of the Interior, Bureau of Land Management
BOPNCA	Morley Nelson Snake River Birds of Prey National Conservation Area
Companies	PacifiCorp, dba Rocky Mountain Power, and Idaho Power Company (Idaho Power)
EIS	Environmental Impact Statement
Gateway West	Gateway West Transmission Line Project
Idaho Power	Idaho Power Company
kV	kilovolt
MEP	Mitigation and Enhancement Portfolio (Appendix B)
MP	milepost
NLCS	National Landscape Conservation System
OCTC	Orchard Combat Training Center
POD	Plan of Development
Project	Gateway West Transmission Line Project
RAC	Resource Advisory Committee
ROD	Record of Decision
ROW	right-of-way
SR	State Route
WECC	Western Electricity Coordinating Council

1.0 INTRODUCTION

1.1 Background

PacifiCorp, doing business as Rocky Mountain Power, and Idaho Power Company (Companies) are proposing to construct and operate the Gateway West Transmission Line Project (Gateway West or Project) consisting of approximately 1,000 miles of new 230-kilovolt (kV), 345-kV, and 500-kV alternating current electric transmission system consisting of 10 segments between the Windstar Substation at Glenrock, Wyoming, and the Hemingway Substation approximately 30 miles southwest of Boise, Idaho. The proposed transmission line is needed to supplement existing transmission lines in order to relieve operating limitations, increase capacity, and improve reliability in the existing electric transmission grid, allowing for the delivery of up to 1,500 megawatts of additional energy for the Companies' larger service areas and to other interconnected systems.

The U.S. Department of the Interior, Bureau of Land Management (BLM) released the final environmental impact statement (Final EIS) on April 26, 2013, that identified alternative routes for Segments 8 and 9 in and near the Morley Nelson Snake River Birds of Prey National Conservation Area (BOPNCA) in southwestern Idaho (BLM 2013a). The BOPNCA was designated by Congress in 1993 and became part of the National Landscape Conservation System (NLCS) in 2000, which was formally established by Public Law 111-11 in 2009. The BLM-preferred alternatives for Segments 8 and 9 avoided the BOPNCA, based on guidelines in manuals developed in 2012 pursuant to Public Law 111-11. However, the BLM-preferred routes had potential impacts on the greater sage-grouse (*Centrocercus urophasianus*), scenic resources in Owyhee County, local communities, and private landowners.

The Record of Decision (ROD), issued by the BLM in November 2013, deferred the decision to grant rights-of-way (ROW) on federal lands for Segments 8 and 9 because the principal siting issue involves a requirement in the enabling legislation (Public Law 103-64) that the BOPNCA be managed "to provide for the conservation, protection and enhancement of raptor populations and habitats and the natural and environmental resources and values associated therewith, and of the scientific, cultural, and educational resources and values of the public lands in the conservation area" (BLM 2013b).

The intent of deferring the decision was to provide "additional time for federal, state, and local permitting agencies to pursue a consensus regarding siting routes in these segments" (BLM 2013b). In addition, the ROD stated that "the BLM needs more time to evaluate and refine" the Draft Mitigation and Enhancement Portfolio Proposal (MEP) prepared by the Companies "to ensure that it is sufficient" to meet the enhancement requirement of the enabling legislation.

In November 2013, BLM established the Boise District Resource Advisory Council (RAC) Subcommittee to examine options for resolving siting issues associated with Segments 8 and 9 of the Project and evaluate the MEP submitted by the Companies. In May 2014, the RAC Subcommittee issued its recommendations in two reports: the first report addressed routing options in or near the BOPNCA (Boise RAC Subcommittee 2014a) and the second concerned the revised MEP submitted by the Companies to the RAC Subcommittee in March 2014 (Boise RAC Subcommittee 2014b). The RAC Subcommittee recommendations were adopted by the Boise District RAC and forwarded on to BLM for action.

In response to the reports of the RAC Subcommittee, the Companies have agreed to adopt the route option recommendations. The Companies have also incorporated some of the RAC Subcommittee MEP recommendations for mitigation and enhancement into the Morley Nelson

Snake River Birds of Prey National Conservation Area DRAFT Mitigation and Enhancement Portfolio Proposal (August 2014 MEP) included as Appendix B.

1.2 Purpose of this Plan of Development Supplement

The purpose of this Plan of Development (POD) Supplement is to update the Companies' ongoing cooperative work with the BLM and the Boise RAC to reach agreement on routes for Segments 8 and 9. The Companies have been working cooperatively for 8 years with the BLM, cooperating agencies, and landowners to design the entire Project. The Companies have considered comments and have revised routing, standard operating procedures, and environmental protection measures including compensatory mitigation, such that the BLM can authorize the Project where it crosses public lands. This work has resulted in a ROD from the BLM for Segments 1 through 7 and Segment 10.

In order to show the adoption of the RAC-recommended routes and the MEP for Segments 8 and 9, the Companies now provide a revised SF-299 and POD. These documents present as the Proposed Action the revised routes recommended by the Boise RAC, provide details on reduced separation and on double-circuiting, and submit the August 2014 MEP that demonstrates that the Project as proposed will meet the requirements of the enabling legislation of the BOPNCA. If authorized to construct and operate the Project through BLM issuance of a ROW grant, the Companies will incorporate the changes described herein.

1.3 Applicability of the Plan of Development

The August 2013 POD (IPC and RMP, 2013a), issued to support the November 2013 Project ROD, outlines the stipulations and mitigation measures identified in the Final EIS that must be followed during construction, operation, and maintenance of the Project. The August 2013 POD is intended to be used Project-wide as 1) a summary of Project environmental requirements and protection measures, and 2) a description of the processes and procedures that will be used to ensure compliance (including the requirements of the U.S. Fish and Wildlife Service, BLM, Bureau of Reclamation, United States Forest Service, and other federal, state, and/or local agencies) as appropriate. This supplement provides additional details to support a ROD for Segments 8 and 9 and incorporates by reference relevant details found in the August 2013 POD and in the January 2013 POD (IPC and RMP, 2013b) issued to support the Final EIS.

The Companies intend to issue one or more PODs for portions of the Project as those portions go to construction. Those construction PODs will contain site-specific details showing the applicability of the environmental requirements and protection measures, and will be an enforceable stipulation of the Notices to Proceed issued for each portion of the Project as it goes to construction.

2.0 ROUTE CHANGES

The routes analyzed in the Final EIS showed the Companies' Proposed Routes for Segment 8 and 9 current at that time. The Proposed Route for Segment 8 diverged from the BLM's Preferred Route as indicated in the Final EIS at node 8e, trending due west across the BOPNCA, then avoiding several sensitive areas and terminating at the Hemingway Substation. The Proposed Route for Segment 9 largely avoided the BOPNCA and followed the West-wide Energy Corridor to the southwest of the towns of Bruneau and Grand View, trending northwest to terminate at the Hemingway Substation.

Since the issuance of the November 2013 ROD, which excluded Segments 8 and 9 from the decision, the Companies have continued discussions with the BLM and the Boise RAC, and

altered their Proposed Action for Segments 8 and 9 accordingly. In March 2014, the Companies submitted a revised MEP informally to the BLM and to the Boise RAC that altered the Companies' Segment 8 Proposed Route by substituting Alternatives 8D and 8E and the Companies' Segment 9 Proposed by substituting Alternative 9G.

The Proposed Routes for Segments 8 and 9, further revised based on the Boise RAC's recommendations, are detailed below. For each of these Segments, the first approximately 90 miles remains unchanged. Those first 90 miles were shown in the Final EIS as representing both the Companies' Proposed Route and the BLM's Preferred Route. Since there is no controversy over these portions of the routes, the Companies are proposing no changes to them. Similarly, the Boise RAC examined only the portions of each Segment where impacts to the BOPNCA were substantial and subject to additional discussion and revision. For the purposes of this POD, revisions to Segment 8 begin at the node identified as 8e in the Final EIS and as node 8-01 in Figure 2-1, while revisions to Segment 9 begin at Node 9g, identified as node 9-01 in Figure 2-2.

A detailed description of each route follows. Table 2-1 lists the location and land use features of the Segment 8 and 9 routes. Detailed maps are contained in Appendix A.

Table 2-1. Segments 8 and 9 Proposed Route Features

Feature	Segment 8 - Summer Lake Option 1 (miles)	Segment 9 - Baja Road-Murphy Flat South (miles)
Total Length	38	65.8
Ownership		
Bureau of Land Management	26.9	57.7
Bureau of Reclamation	2.7	.1
Private	6.2	5.0
State	2.0	5.5
Land Use		
BOPNCA	40.2	53.8
Orchard Combat Training Center	.5	0
Adjacent to Existing Transmission Lines	28.7	31

2.1 Segment 8

The majority of the Boise RAC Subcommittee concluded that the best route for Segment 8 is Summer Lake Option 1. The route option parallels the existing Midpoint to Hemingway 500-kV transmission line across the BOPNCA (Figure 2-1). As presented to the RAC Subcommittee by the Companies, the updated Western Electricity Coordinating Council (WECC) separation criteria allows the new transmission line to be 250 feet from the existing line under certain conditions (see Section 3.1). The RAC Subcommittee concluded that this route should minimize vegetation disturbance by reducing the amount of new access roads to be constructed and maintained within the BOPNCA and elsewhere.

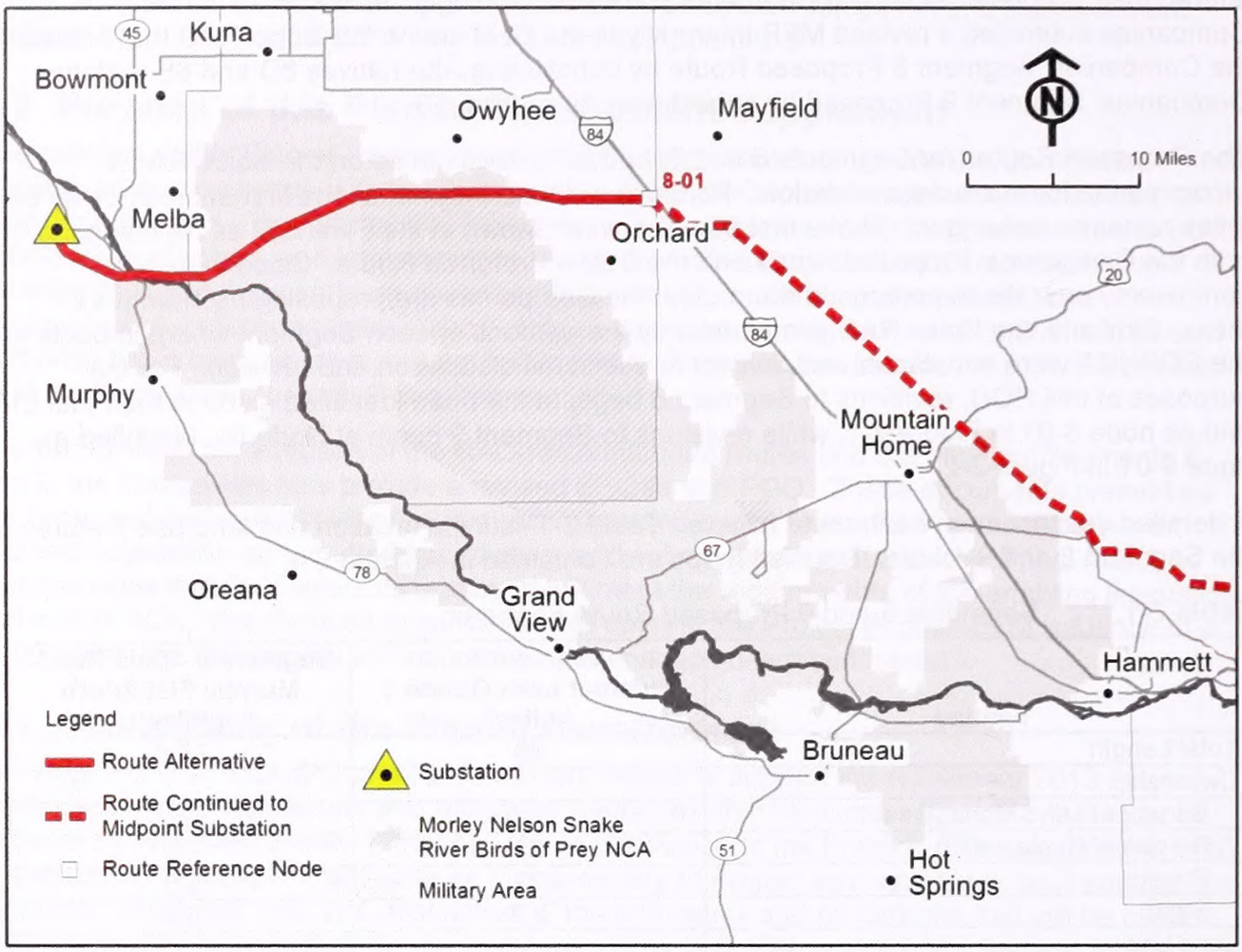


Figure 2-1. Summer Lake Option 1

The Summer Lake Option 1 route option begins at milepost (MP) 0.0 (MP 91.4 of the overall Segment 8 route and identified as 8-01 in Figure 2-1) and generally parallels the existing Midpoint to Hemingway 500-kV transmission line, running about 1,500 feet south of the line before turning northwest and then crossing the existing line at MP 7.1. From there, the alignment generally parallels 250 feet north of the existing line for the remaining 30 miles into the Hemingway Substation. At MP 8.2, the alignment crosses into the BOPNCA and follows the existing Midpoint to Hemingway 500-kV transmission line for approximately 8 miles, north of the boundary to the OCTC. At MP 12.7, the alignment crosses Pleasant Valley Road and continues west for approximately 3.5 miles. To avoid new agricultural impacts on private property and to minimize impacts to the OCTC's tank maneuver Alpha Sector, the alignment shifts south 250 feet at MP 16.2 and assumes the existing ROW of the Midpoint to Hemingway 500-kV transmission line. A 1.1-mile section of the existing Midpoint to Hemingway 500-kV line will be rebuilt 250 feet south within the Alpha Sector. At MP 16.8, the two routes resume their previous alignments, with the new Summer Lake Option 1 route 250 feet north of the existing Midpoint to Hemingway 500-kV line. The route crosses Swan Falls Road at MP 22.2 and the existing Bowmont to Canyon Creek 138-kV transmission line at MP 22.9. At MP 27, the alignment turns west (still parallel to the existing line), leaving the BOPNCA at MP 27.2, and crosses 2 miles of irrigated agriculture at the Canyon and Ada county lines, north of Celebration County Park, before crossing the Snake River between MPs 30.9 and 31.3 at the southern end of Noble

Island. The alignment then turns northwest and parallels the existing line for approximately 5 miles (crossing Hemingway Butte at MP 35.2), before turning north through the existing China Gulch subdivision and into the Hemingway Substation. Table 2-1, above, lists the features of the Segment 8 route.

2.2 Segment 9

The majority of the Boise RAC Subcommittee members concluded that the best route for Segment 9 is Baja Road-Murphy Flat South. This route begins at MP 0.0 (MP 95.6 of the overall Segment 9 route and identified as 9-01 in Figure 2-2). This option will move the existing 138-kV line from its own structures to become part of a double-circuit structure also containing the new 500-kV line for most of the distance through the BOPNCA. The new double-circuit line will incorporate and replace existing 138-kV line near C.J. Strike Reservoir in Owyhee County and along Baja Road on public land in Ada and Elmore counties. The line will cross the Snake River near C.J. Strike Dam and above Swan Falls, near Sinker Butte, where an existing 138-kV transmission line crosses the Snake River. The new 500-kV line will traverse public land on Murphy Flat, avoiding historic Oregon Trail ruts. It will cross Highway 78 near the Rabbit Creek Trailhead, and continue north to the Hemingway Substation, outside of preliminary priority sage-grouse habitat and mainly out of view from most subdivisions in Owyhee County. The advantages of this route are that it will 1) minimize impacts on communities and private property in Owyhee County, 2) minimize the amount of new road that to be constructed and maintained within the BOPNCA and in unroaded areas in Owyhee County, and 3) minimize the construction of transmission towers and roads near greater sage-grouse leks and within greater sage-grouse habitat. Table 2-1, above, lists the features of the Segment 9 route.

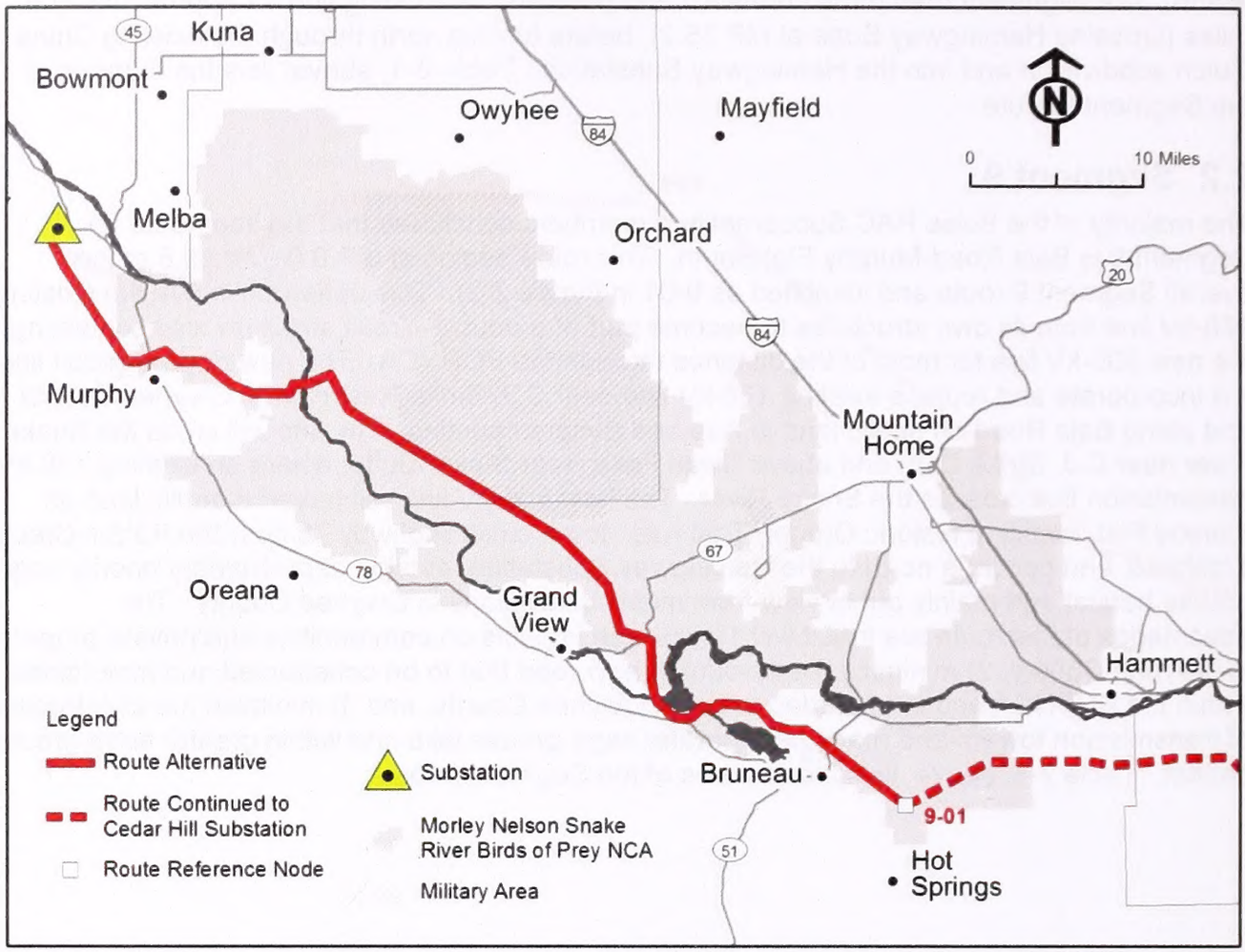


Figure 2-2. Baja Road-Murphy Flat South

The Baja Road-Murphy Flat South route generally follows the previous alignment for Alternative 9G studied in detail in the Final EIS. Beginning south of Bruneau Dunes State Park, within the BOPNCA, the route leaves the established utility corridor in a northwesterly direction, crossing State Route (SR) 51 at MP 5.5, and leaving the BOPNCA at MP 6.7. At MP 10.3, the route re-enters the BOPNCA, double-circuiting with the existing C.J. Strike to Bruneau Bridge 138-kV transmission line near or on the current ROW for approximately 3.3 miles. At MP 14, the two circuits separate for approximately 0.2 mile to permit a more feasible crossing of the Narrows between C.J. Strike Reservoir and the Bruneau Arm. On the west side of the Bruneau River, the two lines again become a double-circuit line across the Cove non-motorized and recreation areas, west approximately 2.1 miles to the C.J. Strike Dam, where the existing 138-kV line double-circuits with the existing Evander Andrews to C.J. Strike 138-kV line north toward Mountain Home. The route parallels the existing double-circuit 138-kV line approximately 200 feet to the west for 4 miles, crossing the Snake River downriver of the C.J. Strike Dam between MPs 17 and 18. At MP 20.8, the alignment shifts west, and then north again, to avoid encroachment in the Mountain Home Air Force Base-controlled airspace and to avoid new impacts to private agricultural lands. At MP 24.8, the alignment crosses the Grand View Highway and then joins the existing Bowmont to Canyon Creek 138-kV transmission line in a new double-circuit alignment along the south side of the Big Baja Road. The new double-circuit alignment proceeds northwest, generally parallel to Big Baja Road and adjacent to the southern

boundary of the OCTC, for 20.2 miles to a location southeast of Swan Falls and north of Tick Basin. Here, the two circuits separate before crossing the Snake River canyon between MPs 47.3 and 47.8 near the existing Sinker Creek to Tap 138-kV transmission line crossing south of Sinker Butte. On the west side of the canyon, the route turns briefly south, parallel to the existing 138-kV line, and then turns west adjacent to the existing Sinker Creek Substation access road. At MP 50.8, the route turns northwest along the east and west faces of several low hills to minimize impacts to irrigated agriculture and to the Oregon National Historic Trail. Near MP 56, the route descends off of the Murphy Rim and crosses the Con Shea Basin north of Murphy. After crossing SR 78 at MP 57.7 north of the Rabbit Creek trailhead, the alignment rejoins the original Segment 9 Proposed Route and continues in a northwesterly direction for approximately 9.5 miles into the Hemingway Substation.

2.3 Lower Voltage Transmission Line and Substation Removal

With acceptance of the August 2014 MEP, removal and modifications of certain lower voltage transmission lines and associated facilities will occur as described below.

2.3.1 Swan Falls to Bowmont Transmission Line

The existing Swan Falls to Bowmont transmission line is a 46-kV line that occurs within a 40-foot wide ROW and crosses approximately 10.8 miles of public lands managed by the BLM (Figure 2-3). As part of the August 2014 MEP, Idaho Power Company (Idaho Power) will remove approximately 7 miles of line on BLM-managed lands, including all structures (although structures may remain if requested by BLM), from the Bowmont Substation to Gage Substation; Idaho Power will continue to use the existing line from the Gage Substation to Ferry Substation to serve its customers. Idaho Power will construct an approximately 1-mile long section to connect the remaining portion of the line to the Idaho Power system. It is expected that the new construction will occur on private land. In addition, approximately 3.9 miles of existing 12.5-kV lines, including 0.25 mile on BLM lands, will be reconstructed. Further, approximately 4 miles of the existing 46-kV line on existing BLM ROW between the Gage and Ferry substations will be converted to a 12.5-kV distribution line. This will require a neutral conductor to be strung on the existing structures, and may also require structure replacements. Idaho Power is also proposing to remove the existing Gage Substation and associated equipment and apparatus. The Gage Substation is on BLM-managed land.

The following summarizes the planned facility removals and modifications affecting the Swan Falls to Bowmont transmission line and facilities:

- Remove approximately 7 miles of existing 46-kV line between the Bowmont and Gage substations.
- Remove Gage Substation.
- Convert approximately 4 miles of existing 46-kV Gage to Ferry/Swan Falls line to 12.5 kV. Structure replacements may be necessary.
- Reconstruct approximately 3.9 miles of existing lines south of Melba including 0.25 mile on public land. Structure replacement on reconstructed lines is assumed to be necessary.

2.3.2 Mountain Home to Bennett Transmission Line

The existing Mountain Home to Bennett transmission line (Line 210) is a 69-kV line with distribution underbuild (Figure 2-4). The 5.6 miles of the line on the BOPNCA without any distribution underbuild will be removed, including all structures (although structures may remain if requested by the BLM). Idaho Power will continue to use the remaining portion of the line to serve customers. Idaho Power will also reconstruct approximately 2.2 miles of the existing

feeder connection for the Sailor Creek (Glenn's Ferry), all of which is on private lands. Idaho Power will conduct maintenance on the remaining portion of the line; this will be determined as part of the engineering analysis to support the removal.

The following summarizes the planned facility removals and modifications affecting the Mountain Home to Bennett transmission line and facilities:

- Remove 5.6 mile portion of existing 69-kV Mountain Home-Bennett line.
- Reconstruct 2.2 miles of Sailor Creek (Glenn's Ferry) feeder line. Structure replacement on reconstructed lines is assumed to be necessary.

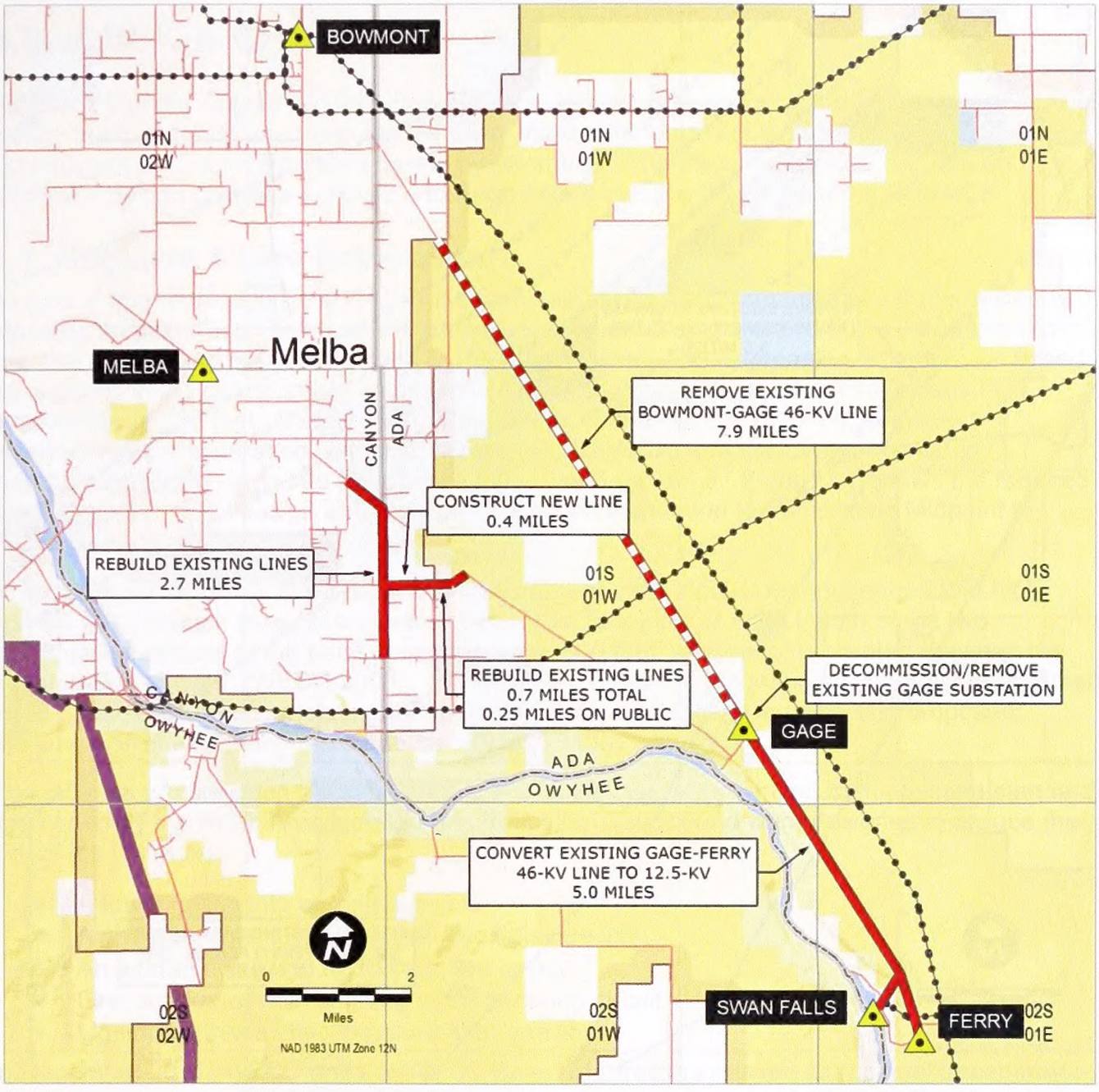


Figure 2-3. Swan Falls to Bowmont Transmission Line Modifications

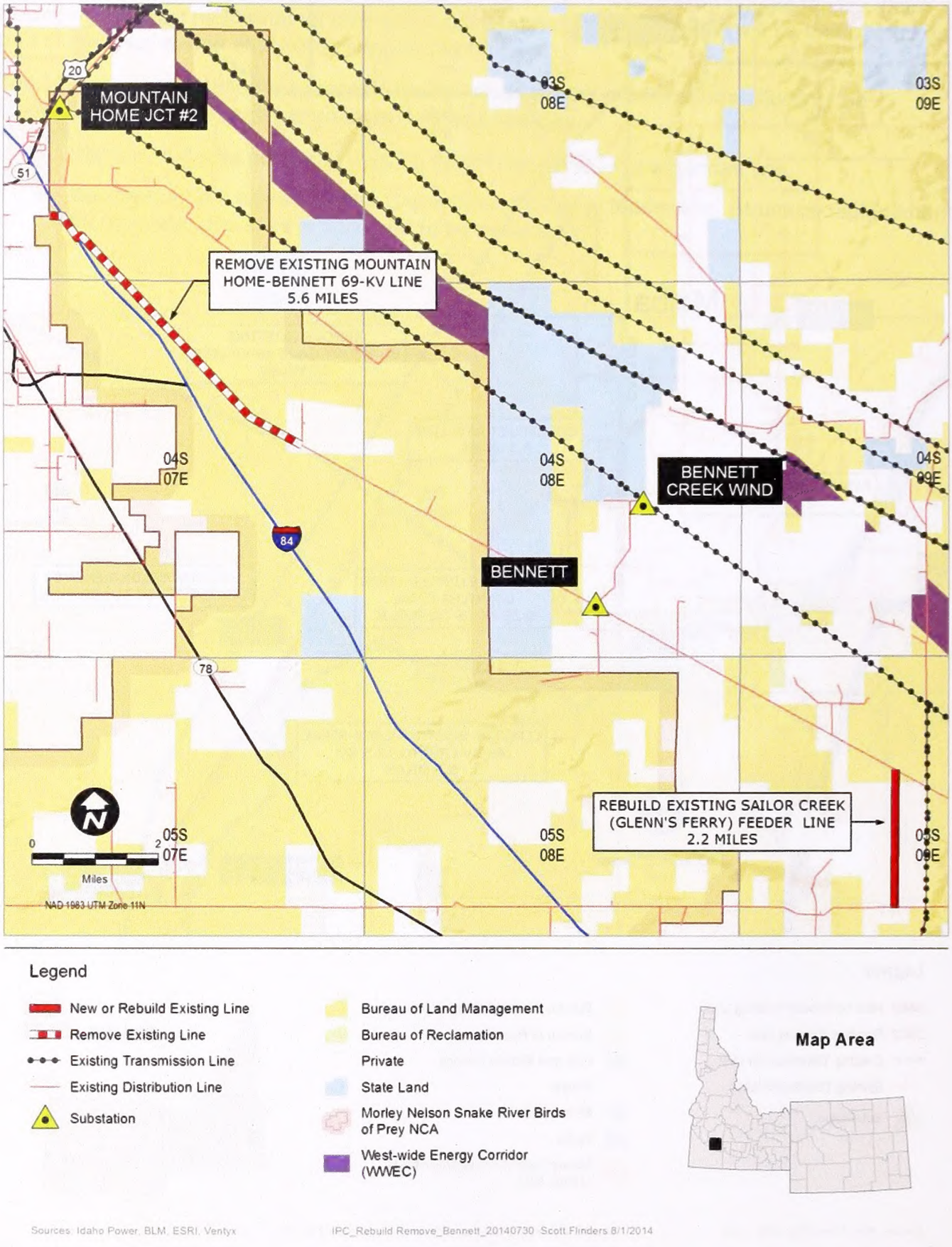


Figure 2-4. Mountain Home to Bennet Transmission Line Modifications

3.0 DESIGN CHANGES

Section 4.0 of the August 2013 POD provides a detailed description of the transmission facilities design features associated with the Gateway West segments requiring new transmission line construction, and is incorporated herein by reference. The discussion below focuses on additional design changes applicable to Segments 8 and 9 within or near the BOPNCA.

3.1 Segment 8 Line Separation

As part of their evaluation, the RAC Subcommittee asked the Companies about the feasibility of reducing the separation between the proposed Segment 8 single-circuit 500-kV transmission line and the existing 500-kV Midpoint to Hemingway line. The Companies reported that based on changes in WECC reliability criteria, line separation could be reduced in this case to approximately 250 feet. Based on the Companies' response, the RAC Subcommittee recommended a separation reduction across the BOPNCA, and the Companies have incorporated that change into a 28.7-mile portion of Segment 8. Figure 3-1 shows the reduced line separation ROW design and location of reduced separation to the existing Midpoint to Hemingway line.

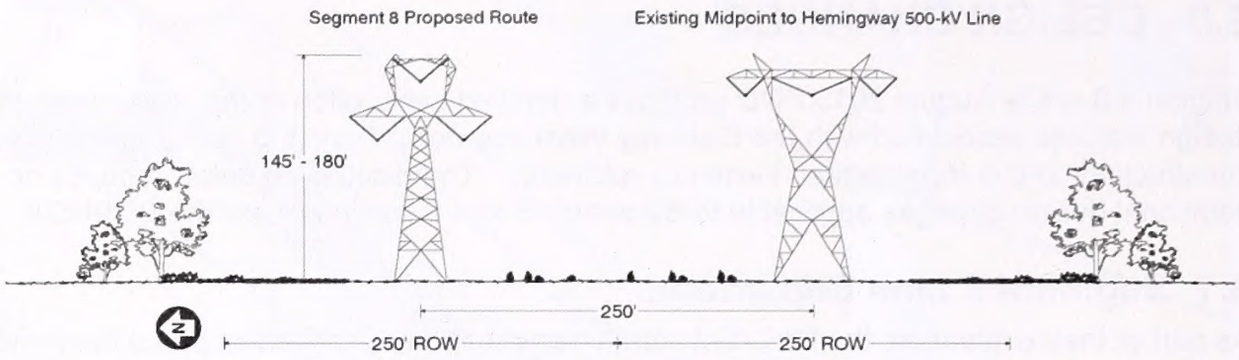
At the time the Gateway West Final EIS was prepared, the WECC recommended that high-voltage transmission lines be separated by at least "the longest span length of the two transmission circuits at the point of separation or 500 feet, whichever is greater, between the transmission circuits" (WECC 2008). For Gateway West, the longest span length was assumed to be 1,500 feet, thereby dictating the minimum distance between existing and proposed transmission lines serving the same load (BLM 2013a).

The regional transmission planning criteria and guidelines were derived from planning standards developed by the North American Electric Reliability Council and were designed to reduce the risk of the following:

- A tower falling into an adjacent line
- A snagged shield wire dragged into adjacent line
- An aircraft flying into more than one circuit
- Fire, smoke, or dust shorting more than one circuit
- Lightning strikes affecting more than one line

In December 2011, WECC and the WECC Board of Directors relaxed its regional transmission planning criterion to a minimum of 250 feet from an existing line (BLM 2013a). This change became effective in April 2012. The separation of transmission lines within a common corridor or lines serving the same load is measured between the centerlines of the transmission lines. All utilities participating in WECC are still responsible for preventing outages and must use the best available planning and engineering to estimate the risk of outages regardless of separation. Under certain limited circumstances, the Companies are willing to consider reducing the separation between high-voltage lines for limited distances and under restricted circumstances.

The Companies plan to use existing roads near and beneath the existing 500-kV transmission line to minimize the overall disturbance footprint of the new line. Rather than constructing a completely new access road network for the Summer Lake Option 1 route, they will use short spur roads from existing roads to provide access to new towers.



Proposed 500-kV Single-Circuit Lattice Steel Tower Adjacent to the North Side of the Existing Midpoint to Hemingway Line (MPs 7.3 to 36)

Figure 3-1. Proposed Reduced Line Separation ROW Design Locations

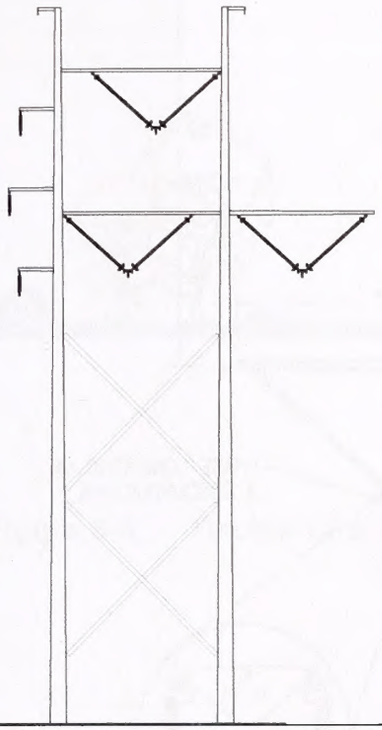
3.2 Segment 9 Double-Circuit Segment

As part of their evaluation, the RAC Subcommittee asked the Companies about the feasibility of co-locating (double-circuiting) 5.4 miles of the existing CJ Strike to Bruneau Bridge and 20.2 miles of the Bowmont to Canyon Creek 138-kV transmission lines and on the same structures with the proposed Segment 9 single-circuit 500-kV line[1]. The Companies reported that double-circuiting would be feasible and have incorporated this change into the proposed Project.

Table 3-1 describes facility features for the double-circuit portion of Segment 9 in the BOPNCA that will be double-circuited. Figure 3-2 shows a sketch of the proposed double-circuit 500/138-kV structure. Figure 3-3 shows the ROW design configuration for the double-circuit portion of Segment 9 within the BOPNCA.

[1] In addition, the 138 and 500-kV circuits will separate on to single-circuit structures for approximately 0.2 mile to permit a more feasible crossing of the Narrows between C.J. Strike Reservoir and the Bruneau Arm.

Table 3-1. Summary of Segment 9 Project Transmission Facilities

Project Facility	Description
Double-Circuit 500/138-kV portion of Segment 9 in the BOPNCA 	• Three-phase 138-kV and three-phase 500-kV construction for all structure designs, conductor spacing and clearances[1/]. • 500-kV Conductor: Bundled 1949.6 kcmil 42/7 aluminum conductor steel reinforced (ACSR)/TWD "Athabaska/TW", with three subconductors per phase. Non-specular (dull) finish rather than a shiny finish. ○ Estimated subconductor diameter: 1.51 inches. ○ 500-kV Bundle spacing: Distance between subconductors is 18 inches and 25 inches. • 138-kV Conductor: Single 715 kcmil 26/7 aluminum conductor steel reinforced (ACSR) "Starling". Non-specular (dull) finish rather than a shiny finish. ○ Estimated conductor diameter: 1.05 inches • Non-reflective, non-refractive insulators. • One optical ground wire (OPGW) containing 48 fibers with diameter of 0.64 inch. • One EHS steel overhead ground wire with diameter of 0.50 inch. • Minimum ground clearance: ○ 138-kV: 24 feet ○ 500-kV: 35 feet • Structure types: double-circuit steel H-frame structures, dull galvanized or self-weathering steel. • Above-ground structure height: varies between 125 and 200 feet. • Approximate distance between structures: 900 to 1,200 feet. • ROW width: 250 feet • The exact quantity, distance between, and placement of the structures will depend on the final detailed design of the transmission line, which is influenced by the terrain, land use, environmental constraints, and economics. Alignment options may also slightly increase or decrease the quantity, location, and height of structures.

1/ Project design follows the Avian Power Line Interaction Committee recommendations. Details for tower construction and components such as conductor spacing are provided in the August 2013 POD.

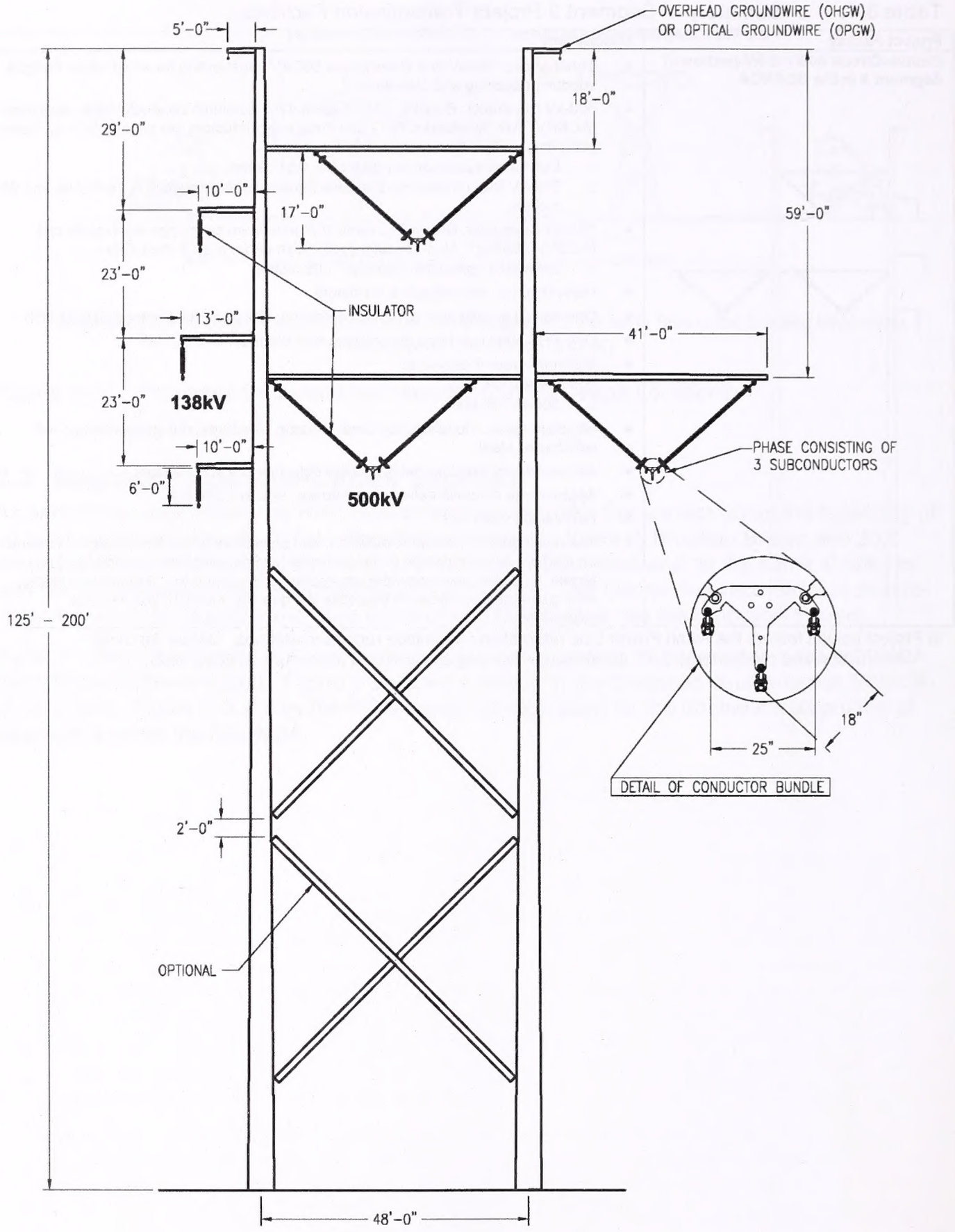


Figure 3-2. Typical Double-Circuit 500/138-kV Structure

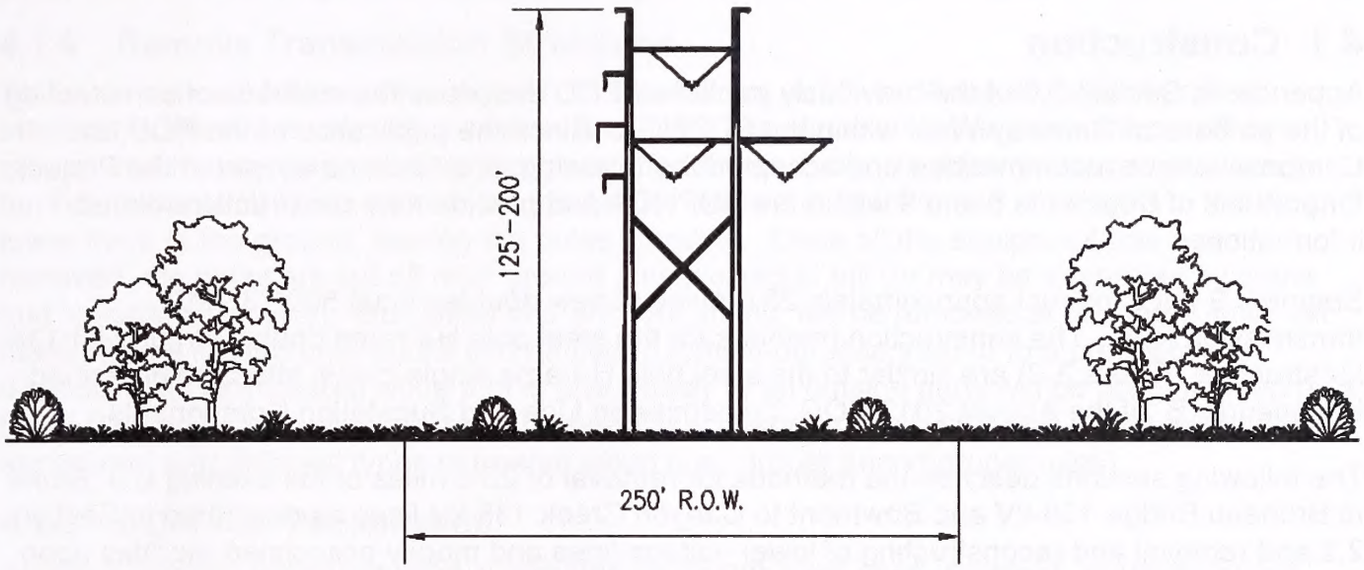


Figure 3-3. Double-Circuit 500/138-kV ROW Design

4.0 CONSTRUCTION AND OPERATION

4.1 Construction

Appendix B, Section 3.0 of the previously published POD describes the methods of constructing of the portions of Gateway West within the BOPNCA. Since the publication of the POD, the Companies have recommended and accepted the following modifications as part of the Project for portions of Segments 8 and 9 within the BOPNCA and provide new construction related information.

Segment 9 will construct approximately 25.6 miles of new double-circuit 500/138-kV transmission line. The construction methods for the steel pole H-Frame double-circuit 500/138-kV structure (Figure 3-2) are similar to the steel pole H-frame single-circuit structure described in Appendix B, of the August 2013 POD, Transmission Line and Substation Components.

The following sections describe the methods for removal of 25.6 miles of the existing C.J. Strike to Bruneau Bridge 138-kV and Bowmont to Canyon Creek 138-kV lines as described in Section 2.2 and removal and reconstructing of lower voltage lines and modify associated facilities upon approval of the August 2014 MEP as described in Section 2.3. The Companies propose to work with the BLM to identify structures the BLM would like to retain within BLM-managed lands. Those structures will still need to be accessed to remove the hardware and conductors but could be left if desired.

4.1.1 Access for Removal of Lines

In order to construct the double-circuit 500/138-kV line or reconstruct lower voltage lines, the existing lines must be removed. The 138-kV line will be replaced in its entirety, including structures. The lower voltage lines will reconstructed using a combination of reconducturing and structure replacement as needed. The lower voltage lines access can generally be confined to 15 feet to one side of the existing line.

Existing access roads or overland travel, including the roads and trails used for construction, maintenance, and inspection of the line, will be used to remove the existing line. All roads or access ways or required disturbance areas used for line removal work will be surveyed, cleared, and staked prior to any construction. On completion of line removal work, all access or spur roads shall be removed in their entirety and in accordance with project requirements and restrictions.

4.1.2 Site Preparation

In general, the existing pads surrounding existing structures are sufficient to allow access for the bucket trucks and small cranes needed to remove the structures. If needed, vegetation on the existing pads may be cut or crushed to allow safe equipment access. Grading will be used only if essential for worker safety. Erosion control measures as specified in the Stormwater Pollution Prevention Plan and Appendix Z of the August 2013 POD will be employed where needed.

4.1.3 Remove Conductors

The next step after establishment of access and a safe work area for the lineworkers is to remove the conductors and shield wire. To remove the conductors, the line is taken out of service. Bucket trucks are generally used to hoist the workers to the wire positions to allow workers to remove the hardware holding the wires in place, and drop the wires to the ground. In some cases, workers may climb the structures to accomplish this. A wire spooling machine is attached to one end of each wire after the wires are all on the ground. Each wire is wound onto reels to be hauled to one of the designated multi-use yards or to an approved off-site disposal

area. Guard equipment or structures will be deployed where energized lines are crossed to prevent the wires being removed from coming in contact with the energized wires.

4.1.4 Remove Transmission Structures

Structure removal follows wire removal. In most cases, a 20- to 30-ton lift capacity crane attaches to the structure's upper section and holds it in place while the poles are cut off near ground and the structure is laid to the ground for disassembly. In a few instances, workers in bucket trucks or climbing remove the insulators, hardware, braces, and crossarms in the air and lower them to the ground, leaving the poles standing. Once all the equipment has been removed, the poles are cut off near ground and allowed to fall (or may be supported by crane and lowered to ground). Guy wires and anchors, if any, will be removed at the same time. All materials are loaded onto trucks and hauled to a multi-purpose yard or to a preapproved disposal site. Any treated wood that is given away to an outside party will be accompanied by a Bill of Sale and Consumer Information Sheets that describe any health and environmental risks associated with different types of treated wood (i.e., proper and improper uses).

4.1.5 ROW Site Reclamation

After conductors, structures, and associated hardware have been removed, workers dig out around the base of the remaining pole section and cut off the pole below ground. The resulting holes are filled and compacted with soils that have been approved for backfill and from approved sources if not available on-site. The final step is to remove and restore work areas, pads, and other disturbed areas to a condition agreed upon by the landowner, tenant or managing agency. Appendix D of the August 2013 POD, the Reclamation Plan, and Appendix Z, Mitigation Measures, contain the plans and requirements for site restoration and reclamation.

4.1.6 Gage Substation Removal

The Gage substation is currently located within a 50-foot by 50-foot fenced area. Removal will require a disturbance area of approximately 100 feet by 100 feet to provide adequate space to remove the entire station. The existing fence and transformer will be removed as will the foundations and miscellaneous concrete to below ground level. The existing 46-kV transmission line will continue to pass through the site and connect to the existing 46-kV line to Ferry Substation and Swan Falls Power Plant. Once construction removal activities are complete, the site will be reclaimed. Appendix D of the August 2013 POD, the Reclamation Plan, and Appendix Z, Mitigation Measures, contain the plans and requirements for site restoration and reclamation.

4.2 Operation

Appendix B, Section 4.0 of the August 2013 POD describes routine and emergency response measures the Companies will employ during operation. These measures apply without change to the Project as proposed in the SF-299 and this POD Supplement for Segments 8 and 9.

5.0 DECOMMISSIONING

Appendix B, Section 5.0 of the August 2013 POD describes how the proposed transmission line would be removed from service at the end of the useful life of the Project including dismantling and removal of conductors, insulators, and hardware from the ROW. Structures would be removed, foundations would be removed to below ground surface, and following abandonment and removal of the transmission line structures and equipment, any areas disturbed during line dismantling would be reclaimed and rehabilitated. No changes are proposed to this approach in this POD Supplement.

As part of the August MEP described in Appendix B, portions of two existing lower-voltage power lines and one substation owned by IPC from areas within the BOPNCA will be removed. The removal methods will be the same as described in Appendix B, Section 5.0 of the August 2013 POD except that the BLM may specify that one or more power poles be left for perching and nesting opportunities for birds of prey.

6.0 MITIGATION AND ENHANCEMENT PORTFOLIO

The August 2014 MEP from the Companies included as Appendix B to this POD Supplement is intended to offer sufficient mitigation and enhancement for the resources and values for which the BOPNCA was designated to allow the BLM to complete its decision process for Segments 8 and 9 of the Project and issue a ROD for these segments. It was first submitted to the BLM as part of the Companies' comments on the Final EIS in 2013 and entered into the Administrative Record at that time. Subsequent to the issuance of the ROD, the Companies continued conversations with the BLM and subsequently with the Boise RAC and the RAC Subcommittee. A version of the MEP was issued in January 2014 and another version shared with the RAC Subcommittee in March 2014. Additional comments were provided by BLM in August 2014. The August 2014 MEP has been updated since the version prepared for the RAC Subcommittee and reflects the Companies' responses to the RAC Subcommittee recommendations and BLM comments.

7.0 LITERATURE CITED

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Boise RAC Subcommittee (Boise District Resource Advisory Council Subcommittee). 2014a. Boise District Resource Advisory Council Subcommittee Report on Gateway West Segments 8 and 9 Route Options In or Near the Morley Nelson Snake River Birds of Prey National Conservation Area.

Boise RAC Subcommittee. 2014b. Boise District Resource Advisory Council Subcommittee Review and Comments on the Gateway West Transmission Line Project Mitigation and Enhancement Portfolio for the Morley Nelson Snake River Birds of Prey National Conservation Area.

IPC and RMP (Idaho Power Company and Rocky Mountain Power). 2013a. Gateway West Transmission Line Project Plan of Development. August.

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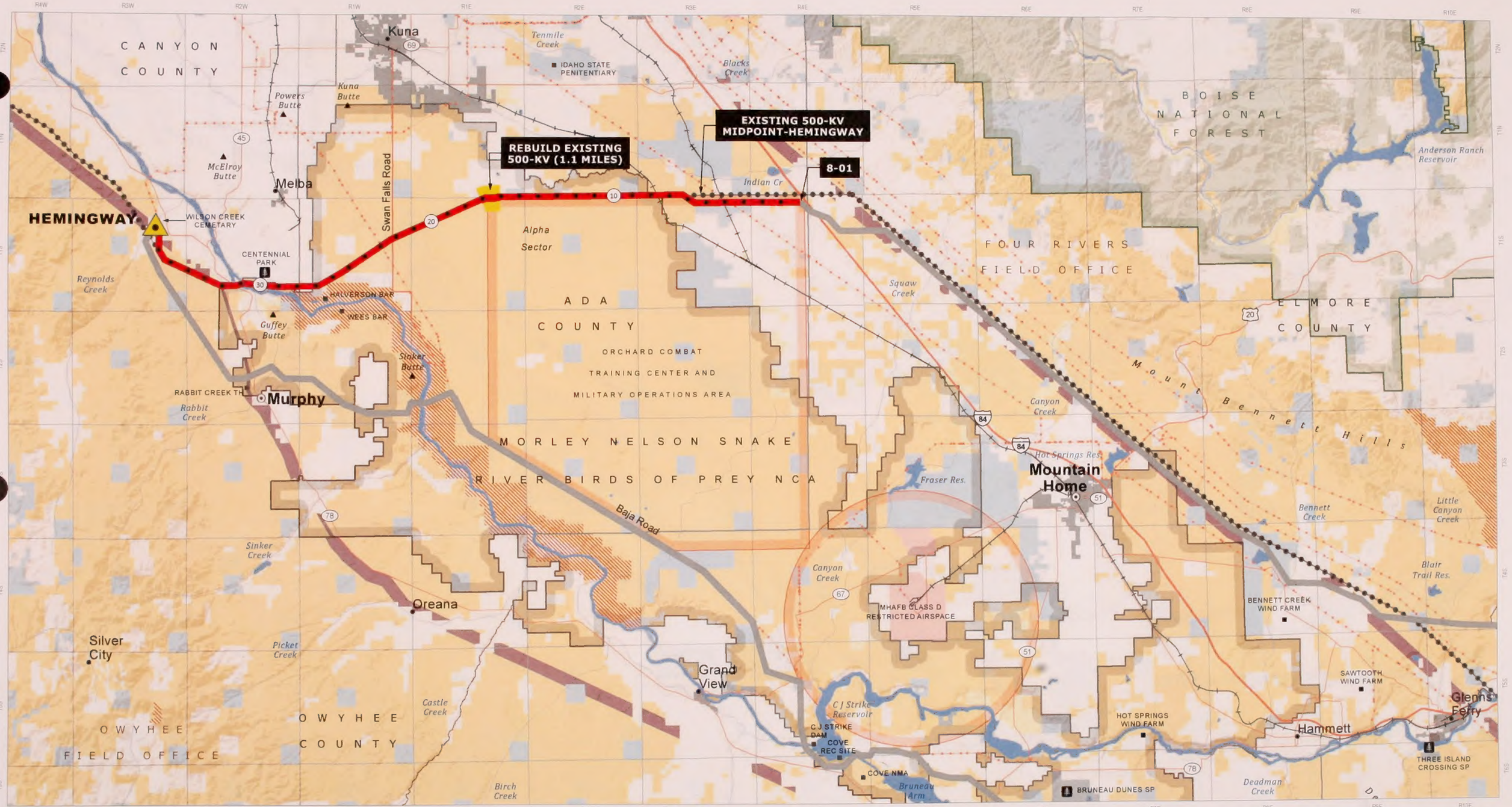
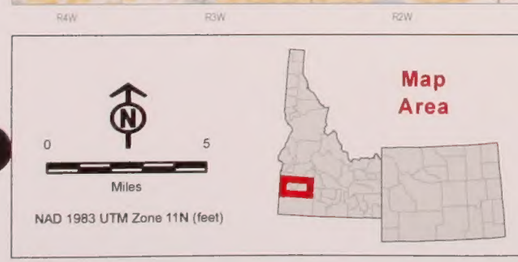
WECC (Western Electricity Coordinating Council). 2008. TPL – (001 thru 004) – WECC – 1 – CR – System Performance Criteria. Available online at http://www.wecc.biz/Standards/WECC%20Criteria/Forms/AllItems.aspx

APPENDIX A
LOCATION MAPS

HEMINGWAY
MIDPOINT
CEDAR HILL
8-01
9-01
Kuna
Melba
Murphy
Oreana
Silver City
Grand View
Mountain Home
Bruneau
Hammett
Glenns Ferry
King Hill
Bellevue
Fairfield
Carey
Richfield
Gooding
Shoshone
Dietrich
Bliss
Hagerman
Wendell
Jerome
Eden
Hazelton
Twin Falls
Kimberly
Hansen
Murtaugh
Buhl
Filer
Castleford
Hollister
CANYON COUNTY
ADA COUNTY
OWYHEE COUNTY
BOISE NATIONAL FOREST
FOUR RIVERS FIELD OFFICE
ELMORE COUNTY
CAMAS COUNTY
BLAINE COUNTY
SHOSHONE FIELD OFFICE
GOODING COUNTY
LINCOLN COUNTY
JEROME COUNTY
TWIN FALLS COUNTY
BURLEY FIELD OFFICE
CASSIA COUNTY
OWYHEE FIELD OFFICE
BRUNEAU FIELD OFFICE
JARBIDGE FIELD OFFICE
MORLEY NELSON SNAKE RIVER BIRDS OF PREY NCA
ORCHARD COMBAT TRAINING CENTER AND MILITARY OPERATIONS AREA
OWYHEE MILITARY OPERATIONS AREA (MOA)
JARBIDGE MILITARY OPERATIONS AREA (MOA)
MHAFB CLASS D RESTRICTED AIRSPACE
IDAHO STATE PENITENTIARY
WILSON CREEK CEMETARY
CENTENNIAL PARK
Mount Bennett Hills
Bruneau Desert Blue Ridge
Deadman Flat
SAYLOR CREEK RANGE
JUNIPER BUTTE RANGE
Anderson Ranch Reservoir
Hot Springs Res.
Fraser Res.
Blair Trail Res.
Pioneer Res
C J Strike Reservoir
BENNETT CR WIND FARM
SAWTOOTH WIND FARM
HOT SPRINGS WIND FARM
TUANA GULCH WIND FARM
CASSIA GULCH WIND FARM
TUANA SPRINGS WIND FARM
FOSSIL GULCH WIND FARM
CASSIA WIND FARM
SALMON FALLS WIND FARM
PILGRIM STAGE STATION WIND FARM
YAHOO CREEK WIND FARM
BRUNEAU DUNES SP
MALAD GORGE SP
HAGERMAN FOSSIL BEDS NM
BALANCED ROCK CP
TWIN FALLS MILITARY RESERVATION
COVE
Bruneau Arm
Black Mesa
Lilly Grade
Pole Hole
Sailor Creek
Deadman Creek
Sugar Creek
Wickahoney Creek
Clover Creek
Sheep Creek
Jarbidge River
Duncan Creek
Blue Creek
Battle Creek
Deep Creek
Devil Creek
Cedar Creek
Salmon Falls Creek
Snake River
Big Wood River
Little Wood River
Camas Creek
Willow Creek
Soldier Creek
Dry Creek
Fish Creek
Silver Creek
Jim Byrns Slough
Thorn Creek
Clover Creek
Little Canyon Creek
Bennett Creek
Canyon Creek
Squaw Creek
Reynolds Creek
Succor Creek
Rabbit Creek
Cow Creek
Sinker Creek
Sinker Butte
Guffey Butte
Powers Butte
McElroy Butte
Kuna Butte
Tenmile Creek
Blacks Creek
Indian Cr
Alpha Sector
Picket Creek
Jordan Creek
Castle Creek
Birch Creek
North Boulder Creek
Big Boulder Creek
Rock Creek
Shoofly Creek
Jacks Creek
Little Jacks Creek
Big Jacks Creek
Bruneau River
North Fork Owyhee River
Hurry Back Creek
Pole Creek
Middle Fork Owyhee River
Deep Creek
Duncan Creek
Melon Valley
Rock Creek
East Fork Dry Creek
Goose Creek
Map Area
0 10 Miles
NAD 1983 UTM Zone 11N (feet)
Segment 8
Proposed
Summer Lake Option 1
Segment 9
Proposed
Segment 9 Proposed
Other Features
Substation
Milepost
Existing Transmission Lines (138-kV or greater)
West Wide Energy Corridor (WWEC)
Protected Area or Restricted Access
City Limits
Land Status
Bureau of Land Management
National Forest
National Park Service
Fish and Wildlife Service
Bureau of Reclamation
Military Reservation/Corps of Engineers
State
State Wildlife, Park, Recreation or Other
Private
ROCKY MOUNTAIN POWER
IDAHO POWER
Gateway West Transmission Line Project
Segments 8 and 9 Overview
Appendix A-1
Sources | BLM, USFS, ESRI
POD_Appendix A-1 Overview Scott Flinders 8/1/2014





Segment 8
- Summer Lake Option 1
- Rebuild Existing 500-kV
- Other Route

Other Features
- Substation
- Ten Mile
- Mile
- Existing Midpoint-Heminway 500-kV Line
- Existing Transmission Lines (138-kV or greater)
- West Wide Energy Corridor (WWEC)
- Protected Area or Restricted Access
- City Limits

Land Status
- Bureau of Land Management
- National Forest
- Fish and Wildlife Service
- Bureau of Reclamation
- Military Reservation/Corps of Engineers
- State
- State Wildlife, Park, Recreation or Other
- Private

ROCKY MOUNTAIN POWER
IDAHO POWER

Gateway West
Transmission Line Project

Segment 8
Summer Lake Option 1
Appendix A-2

Sources | BLM, USFS, ESRI

POD_Appendix A-2_Segment 8_v2 scott flinders 8/6/2014

HEMINGWAY
WILSON CREEK CEMETARY
McElroy Butte
Melba
CENTENNIAL PARK
Reynolds Creek
HALVERSON BAR
Guffey Butte
Sinker Butte
RABBIT CREEK TH
Murphy
Rabbit Creek
Alpha Sector
ADA COUNTY
ORCHARD COMBAT TRAINING CENTER AND MILITARY OPERATIONS AREA
MORLEY NELSON SNAKE RIVER BIRDS OF PREY NCA
Baja Road
DOUBLE-CIRCUIT 500/138-KV (20.2 MILES)
Sinker Creek
Oreana
Silver City
Picket Creek
Grand View
OWYHEE FIELD OFFICE
OWYHEE COUNTY
Castle Creek
Birch Creek
North Boulder Creek
BRUNEAU FIELD OFFICE
DOUBLE-CIRCUIT 500/138-KV (2.1 MILES)
C J STRIKE DAM
COVE REC SITE
COVE NMA
C J Strike Reservoir
DOUBLE-CIRCUIT 500/138-KV (3.3 MILES)
Bruneau Arm
Bruneau
Shoofly Creek
Bruneau River
Jacks Creek
Sugar Creek
9-01
SAYLOR CREEK RANGE
FOUR RIVERS FIELD OFFICE
Squaw Creek
Canyon Creek
Fraser Res.
Hot Springs Res.
Mountain Home
MHAFB CLASS D RESTRICTED AIRSPACE
ELMORE COUNTY
Mount Bennett Hills
Anderson Ranch Reservoir
Bennett Creek
Little Canyon Creek
Blair Trail Res.
BENNETT CREEK WIND FARM
HOT SPRINGS WIND FARM
SAWTOOTH WIND FARM
BRUNEAU DUNES SP
Deadman Creek
Deadman Flat
Hammett
Glenns Ferry
THREE ISLAND CROSSING SP
Sailor Creek

Map Area

0 5
Miles
NAD 1983 UTM Zone 11N (feet)

Segment 9
- Baja Road-Murphy Flat South
- Double-circuited Portion
- Other Route

Other Features
- Substation
- Ten Mile
- Mile
- Existing Transmission Lines (138-kV or greater)
- West Wide Energy Corridor (WWEC)
- Protected Area or Restricted Access
- City Limits

Land Status
- Bureau of Land Management
- National Forest
- Fish and Wildlife Service
- Bureau of Reclamation
- Military Reservation/Corps of Engineers
- State
- State Wildlife, Park, Recreation or Other
- Private

ROCKY MOUNTAIN POWER
IDAHO POWER

Gateway West
Transmission Line Project

Segment 9
Baja Road-Murphy Flat South
Appendix A-3

Sources | BLM, USFS, ESRI

POD_Appendix A-3_Segment 9 Scott Flinders 8/1/2014

APPENDIX B
MORLEY NELSON SNAKE RIVER BIRDS OF PREY NATIONAL CONSERVATIONN AREA DRAFT MITIGATION AND ENHANCEMENT PORTFOLIO PROPOSAL

See Appendix C-1 of the SEIS to view the August 2014 Draft Mitigation and Enhancement Portfolio.

Gateway West Transmission Line Project
Addendum to August POD Supplement
Use of Baja Road and Disturbance Calculations

On August 7, 2014 PacifiCorp, doing business as Rocky Mountain Power (RMP), and Idaho Power Company's (IPC) collectively the Companies submitted to Bureau of Land Management (BLM) a Plan of Development Supplement for the Gateway West Transmission Line (Project or Gateway West). This addendum to the supplement describes use of the Baja Road and disturbance during construction and operation.

1.0 BAJA ROAD

Baja Road is the access road used for construction and maintenance of the existing 138-kV transmission lines. These lines would be removed and reconfigured onto a double-circuit 500/138-kV structure series for approximately 26.5miles of which, 18.3 miles is in the SRBOP and adjacent to Baja Road as part of the Baja Road-Murphy Flat South alternative identified by the Boise District Resource Advisory Council (RAC) and adopted by the Companies as part of the Segment 9 Proposed Route. The Companies intend to utilize the existing road with "no improvement". Project-wide, existing roads requiring "no Improvement" include existing maintained paved or all-weather surfaced roads that are able to be used in their current condition (PacifiCorp and Idaho Power, 2013). The Companies' construction standards will be met, including the use of a minimum travel surface width of 14 feet wide and requiring a travel surface width of up to 20 feet depending on the radius of curves. The use of the term 'no improvement' is intended to signify that no additional new disturbance will be created outside of the established disturbed area. As such, the existing roads requiring "no improvement" for access could include regular maintenance to make the road passable for construction. Regular maintenance could include but is not limited to minor blading activities, repair of washed out areas, wash boarded areas, depressions requiring graveling, approach installation, and other minor improvements within the established disturbed area.

The Baja Road meets the criteria for "no improvement". **Figure 1-1** shows the typical condition of the Baja Road adjacent to the existing 138-kv line. The view is looking south and the proposed location of the new double-circuit 500/138-kV line is on the right side of the road.

Figure 1-1. Current Condition of the Baja Road

Based on aerial imagery and field reconnaissance, the road has a 14 feet wide travel surface and the total established disturbed area or width is approximately 40 feet. The road is generally in excellent condition having been recently restored. There may be a few washboard areas, but the width and gravel surface should be sufficient without any additional improvements outside of the current travel way. The construction concept for installation of the planned 500/138-kV line would involve in most cases a stub road extending from the edge of the existing Baja Road to an approximately 1.4 acre construction pad (**Figure 1-2**). The centerline of the Proposed Route is approximately 140 feet off of the road centerline. The terrain is mostly flat, so overland travel to access the construction pads or structures for operation and maintenance would stay within the Project-wide travel way (14 foot wide during construction and 8 feet wide during operations). **Figure 1-1** and **Figure 1-3** illustrate the terrain and construction pad features.

Figure 1.2. Conceptual Stub Road Configuration from Baja Road.

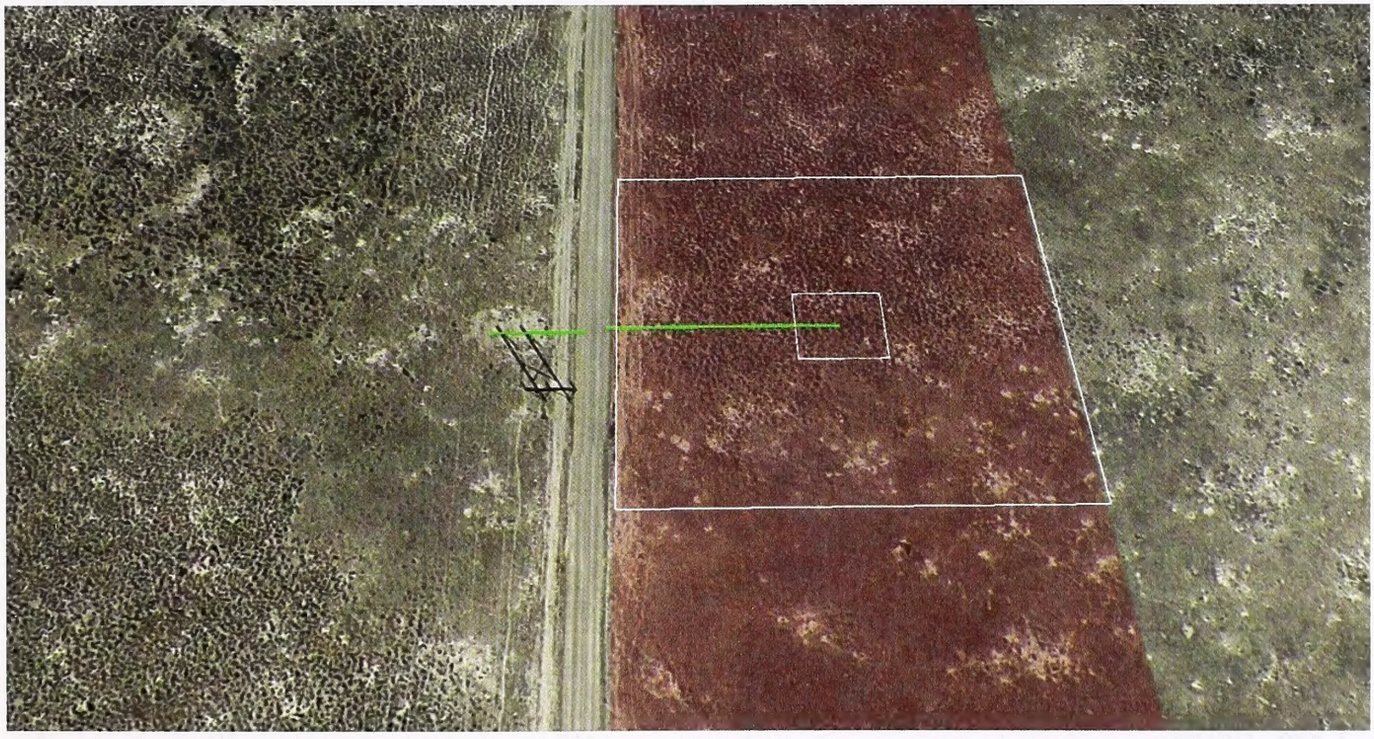


Figure 1-3. Conceptual Construction Work Area (large white box).

2.0 CONSTRUCTION AND OPERATION DISTURBANCE

The amount of land disturbed during construction and operation is a function of length, extent of facility improvements and location. **Table 2-1** shows the length, extent of new, rebuild and removed facilities and ownership associated with the proposed routes for Segment 8 (Summer Lake Option 1) and Segment 9 (Baja Road-Murphy Flat South).

Table 2-1. Segments 8 and 9 Proposed Route Features

Feature	Segment 8 - Summer Lake Option 1 (miles)	Segment 9 - Baja Road-Murphy Flat South (miles)
Total Length	38.3 (1.1 rebuild)	89.3 (20.9 removal)
Ownership		
Bureau of Land Management	27.1 (0.8)	75.3 (17.6)
Bureau of Reclamation	2.7	0.1
Private	6.2 (0.2)	5.1 (0.2)
State	2.0	8.5 (3.1)
Land Use		
BOPNCA	23.1 (1.1)	73.7 (20.9)
Orchard Combat Training Center	0.5	--
Adjacent to Existing Transmission Lines	30.7	55.0 (20.9)

Land disturbance as described in **Table 2-2** is the estimated amount of land that would be disturbed during construction or required to be permanently converted to operational uses. Estimates for construction disturbances are based on best professional judgment and experience with this type of project following the process described in Section 3.1 of the Gateway West EIS. Estimates were made of disturbance areas resulting from each construction activity involving structure placement, access roads, contractor and material staging areas, and new and expanded substations. For each route, the amount of disturbance reflects use of existing access roads meeting the definition of "no improvement" as described above. **Table 2-3** describes the dimensions of the structure construction pads and area permanently occupied by structures after restoration.

Table 2-2. Summary of Transmission Line Land Disturbance Resulting from Construction and Operations [(1)(2)]

Segment/Project Component	Land Affected During Construction (acres)	Land Affected During Operations (acres)
Segment 8		
Access - Existing Road, Improved	136	43
Access New Road	21	10
Deadend Pulling - 500-kV (1-SC)	121	-
Fly Yard	112	-
Pad - 500-kV	245	10
Pulling-Tensioning - 500-kV (1-SC)	17	-
Regeneration Site	-	-
Staging Area	40	-
Subtotal - Segment 8	**693**	**63**
Segment 9		

Table 2-2. Summary of Transmission Line Land Disturbance Resulting from Construction and Operations [1][2]

Segment/Project Component	Land Affected During Construction (acres)	Land Affected During Operations (acres)
Access - Existing Road, Improved	195	60
Access - New Road	76	32
Deadend Pulling - 138-kV (1-SC)	21	
Deadend Pulling - 500/138-kV (1-DC)	96	-
Deadend Pulling - 500-kV (1-SC)	163	-
Fly Yard	212	-
Pad - 138-kV	1	0.2
Pad - 138-kV (Removal)	49	-
Pad - 500/138-kV (1-DC)	255	10
Pad - 500-kV	268	11
Pulling-Tensioning - 138-kV (1-SC)	1	-
Pulling-Tensioning - 500/138-kV (1-DC)	14	-
Pulling-Tensioning - 500kV (1-SC)	15	-
Regeneration Site (3)	1	0.5
Staging Area	60	-
Subtotal - Segment 9	**1428**	**114**
Total	**2121**	**177**

1/ The exact land requirements would depend on the final detailed design of the transmission line, which is influenced by the terrain, land use, and economics. Alignment options may also slightly increase or decrease these values.

2/ Acreages in table are rounded to the nearest acre; columns therefore may not sum exactly.

3/ Values are given in 0.5-acre increments because regeneration sites are typically 0.5 acre each.

Assumptions/Notes:

1. ROW width for the 500-kV single circuit and 500/138-kV double circuit segments are 250 feet.
2. The staging areas would serve as field offices, reporting locations for workers, parking space for vehicles and equipment, sites for material storage, fabrication assembly and stations for equipment maintenance, and concrete batch plants.
3. Staging/material storage yards/batch plants would be approximately 20 acres for single-circuit 500-kVand double-circuit 500/138-kV lines. They would be located at each end of a segment, and every 20 to 30 miles along the line.
4. Fly yards would be 10 to 15 acres located approximately every 5 miles. Values in table assume helicopter construction for all single-circuit 500-kV and double-circuit 500/138-kV construction. The construction contractor may choose to construct using ground-based techniques, therefore not utilizing fly yards.
5. For 500 kV, wiring pulling/splicing sites would be the ROW width x 600 feet located approximately every 3 miles; for 138-kV, ROW width x 400 feet located every 9,300 feet. Typically, only sites that would be off of the ROW would be at large angle dead-ends. It is estimated that one in four sites would be off of the ROW.

Table 2-3. Summary of Transmission Line Land Disturbance Resulting from Construction and Operations

Segment	Transmission Line Length (miles)	Structure Type	Typical Height (feet)	No. of Structures	Average Distance Between (feet)	Temporary Disturbance Area per structure (sq. feet.)	Permanent Disturbance Area per structure (sq. feet.)
8, 9	54.6	500-kV Single-Circuit Lattice Tower	145–180	358	1,200–1,300	ROW Width 250 feet x 250 feet = 1.42 acres	ROW Width 50 feet x 50 feet = 0.06 acre
9	0.5	500/138-kV Double-Circuit Lattice Tower	145–180	178	900-1,200	ROW Width 250 feet x 250 feet = 1.43 acres	ROW Width 50 feet x 50 feet = 0.06 acre

3.0 REFERENCES

IPC and RMP (Idaho Power Company and Rocky Mountain Power). 2013. Gateway West Transmission Line Project Plan of Development. August.

Appendix C

Appendix C

Proponents' Draft Mitigation and Enhancement Portfolio

Morley Nelson Snake River Birds of Prey National Conservation Area

DRAFT Mitigation and Enhancement Portfolio Proposal

Gateway West Transmission Line Project

Prepared by:

PacifiCorp
1407 W North Temple
Salt Lake City, UT 84116

August 2014

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ACRONYMS AND ABBREVIATIONS

BLM	Bureau of Land Management
BMP	Best Management Practices
BOPNCA	Morley Nelson Snake River Birds of Prey National Conservation Area
CIC	compliance inspection contractor
Committee	Oversight Committee
Companies	Rocky Mountain Power and Idaho Power Company
EIS	Environmental Impact Statement
EPM	Environmental Protection Measure
FLPMA	Federal Land Policy and Management Act
FTE	full-time equivalent
Gateway West	Gateway West Transmission Line Project
HPTP	Historic Properties Treatment Plan
IDANG	Idaho Army National Guard
IPC	Idaho Power Company
kV	kilovolt
NCA	National Conservation Area
NHT	National Historic Trail
NLCS	National Landscape Conservation System
NMA	Non-Motorized Area
NRCS	Natural Resources Conservation Service
NTP	Notice to Proceed
OCTC	Orchard Combat Training Center
POD	Plan of Development (Bureau of Land Management)
PPH	preliminary priority habitat
PP&L	Pacific Power and Light Company (now PacifiCorp)
Project	Gateway West Transmission Line Project
RAC	Resource Advisory Council (Boise District)
RMP	Resource Management Plan
ROD	Record of Decision
ROW	right-of-way
SF299	Standard Form 299
SR	State Route
SRBOP	Snake River Birds of Prey National Conservation Area
SRMA	Special Recreation Management Area
USFWS	U.S. Fish and Wildlife Service
VRM	Visual Resource Management
WWEC	West-wide Energy Corridor

1.0 INTRODUCTION

This Draft Mitigation and Enhancement Portfolio Proposal (Draft MEP) from PacifiCorp, doing business as Rocky Mountain Power, and Idaho Power Company (Companies), is intended to offer sufficient mitigation and enhancement for the resources and values for which the Morley Nelson Snake River Birds of Prey National Conservation Area (BOPNCA or SRBOP or NCA) was designated to allow the Bureau of Land Management (BLM) to complete its decision process for Segments 8 and 9 of the Gateway West Transmission Line Project and issue a Record of Decision (ROD) for these segments.

1.1 Gateway West Transmission Line Project Description

The Companies, are proposing to construct and operate the Gateway West Transmission Line Project (Gateway West or Project) consisting of approximately 990 miles of new 230-kilovolt (kV), 345-kV, and 500-kV alternating current electric transmission system consisting of 10 segments between the Windstar Substation at Glenrock, Wyoming, and the Hemingway Substation approximately 30 miles southwest of Boise, Idaho. The proposed transmission line is needed to supplement existing transmission lines in order to relieve operating limitations, increase capacity, and improve reliability in the existing electric transmission grid, allowing for the delivery of up to 1,500 megawatts of additional energy for the Companies' larger service areas and to other interconnected systems.

The Project includes ground-disturbing activities associated with the construction, operation, and maintenance of aboveground, single-circuit transmission lines involving towers, access roads, multi-purpose areas, fly yards, pulling sites, substations, communication sites, and electrical supply distribution lines. The Project crosses private land and public lands administered by the BLM, U.S. Department of Agriculture Forest Service, Bureau of Reclamation, and the states of Idaho and Wyoming, including the BOPNCA.

The compensatory mitigation and enhancement proposed within this Draft MEP is based upon the Project "footprint" or disturbance footprint and line mileage within the BOPNCA on federal lands. The Project "footprint" was developed based on standard construction and operation practices and is defined as follows:

1. "Construction footprint" includes all the areas that may be disturbed during construction, including the full width of access roads including cuts and fills where needed, construction spaces at each structure, etc. The majority of this footprint will be reclaimed (see Appendix B, Plan of Development, for the ROD, which includes the Reclamation Plan, among many other environmental protection plans and includes a detailed description of disturbance in its Appendix B).
2. "Operation footprint" of the Project includes those areas permanently occupied by Project facilities, including the reduced travelway of permanent roads and the footprint occupied by the structures, regeneration stations, and substations.

Table 1, below, shows typical construction and operation footprints for various Project elements. Note that these values were used to estimate disturbance by developing a geodatabase layer using the proposed facility locations and then overlaying that "footprint" database, whether for construction or operation footprint, with the relevant vegetation or land ownership geodatabase layer.

Table 1. Typical Construction and Operation Footprints for Project Elements

Element	Construction Footprint	Operation Footprint
500-kV Lattice Structure and 138-kV/500-kV double-circuit structure	250' x 250' or 2.43 acres	50' x 50' or 0.06 acre; remainder revegetated but not recontoured
Regeneration Station	1 acre	0.5 acre; remainder reclaimed
Access Roads	Length times average 26' wide	Length times average 8' wide; remaining width reclaimed
500-kV in-line pulling and tensioning site	250' x 700' or 4.02 acres	Fully reclaimed
500-kV angle structure pulling and tensioning site	2 @ 250' x 600' or 6.89 acres	Fully reclaimed
Fly Yards (if used)	12.5 acres	Fully reclaimed
Multi-purpose yards	20 acres	Fully reclaimed

Because all the temporary facilities, most of the structure workspaces, and most of the access road construction disturbance will be reclaimed, the operation footprint is much smaller than the construction footprint. For example, for the Companies' proposed routes for both Segments 8 and 9, the long-term project occupancy within BOPNCA on BLM lands is only 97 acres, but the construction footprint within BOPNCA on BLM lands is 1,267 acres.

1.2 Gateway West and BOPNCA

The BLM released the final environmental impact statement (Final EIS) on April 26, 2013, which identified alternative routes for Segments 8 and 9 in and near the BOPNCA in southwestern Idaho (BLM 2013a). The BOPNCA was designated by Congress in 1993 and became part of the National Landscape Conservation System (NLCS) in 2000, which was formally established by Public Law 111-11 in 2009. The BLM preferred alternatives for Segments 8 and 9 avoided the BOPNCA, based on guidelines in manuals developed in 2012 pursuant to Public Law 111-11. However, the BLM-preferred routes had potential impacts on the greater sage-grouse (*Centrocercus urophasianus*), scenic resources in Owyhee County, local communities, and private landowners. The Final EIS described the BLM preferred alternatives and the Companies' proposed routes.

The BLM preferred alternatives, as specified in the Final EIS, were that Segment 8 (described herein as starting at the Midpoint Substation and moving to the west) be constructed along the Proposed Route for the first 92 miles, then constructed through largely private land along Alternative 8B, avoiding most of the crossing of the BOPNCA to arrive at the Hemingway Substation 40 miles later and that Segment 9 (described herein as starting at the Cedar Hill Substation and moving to the west) be built using the Final EIS Proposed Route for the first 95 miles, then use Alternative 9E and some modifications to the Final EIS Proposed Route to arrive at the Hemingway Substation about 76 miles later.

In the Final EIS the Companies proposed to construct Segment 8 from the existing Midpoint Substation near Shoshone, Idaho about 131 miles to the existing Hemingway Substation near Melba, Idaho. The BLM advised that the Proposed Segment 8 crossing of the Halverson Non-Motorized Area could not be permitted at all and the Idaho Army National Guard (IDANG) expressed reservations regarding the crossing of the Alpha Maneuver Sector. The Companies also originally proposed to construct Segment 9 about 162 miles from the proposed Cedar Hill Substation southeast of Twin Falls, Idaho, to the existing Hemingway Substation. During the siting and routing discussions and meetings with the various task forces formed by local landowners, governments, and the local BLM (see Section 3.3), additional alternatives for Segment 9 were considered. The Owyhee County task force proposed Alternative 9D, which parallels an existing line within the BOPNCA, and the BLM, in response to concerns raised by that proposal, proposed Alternative 9G.

The Companies, considering the feedback from the BLM and public modified the Final EIS Proposed Route. The route modifications were not formally submitted to the BLM; rather the Companies submitted the route modifications in conjunction with a previous version of the Draft MEP as a comment to the Final EIS during the public comment period. The Companies modified the Final EIS Proposed Route for Segment 8, including Alternatives 8D and 8E, which were proposed to avoid the Alpha Sector and the problematic crossing of the Snake River and the Halverson NMA, respectively. The Companies modified Segment 9 through the inclusion of Alternative 9G.

The ROD, issued by the BLM in November 2013, deferred the decision to grant rights-of-way (ROW) on federal lands for Segments 8 and 9 because the principal siting issue involves a requirement in the enabling legislation (Public Law 103-64) that the BOPNCA be managed "to provide for the conservation, protection and enhancement of raptor populations and habitats and the natural and environmental resources and values associated therewith, and of the scientific, cultural, and educational resources and values of the public lands in the conservation area" (BLM 2013b).

The intent of deferring the decision was to provide "additional time for federal, state, and local permitting agencies to pursue a consensus regarding siting routes in these segments" (BLM 2013b). In addition, the ROD stated that "the BLM needs more time to evaluate and refine" the Draft MEP prepared by the Companies "to ensure that it is sufficient" to meet the enhancement requirement of the enabling legislation.

In November 2013, BLM established the Boise District Resource Advisory Council (RAC) Subcommittee to examine options for resolving siting issues associated with Segments 8 and 9 of the Project and evaluate the Draft MEP submitted by the Companies. The RAC Subcommittee evaluated the Companies' Proposed Routes as modified by Alternatives 8D, 8E, and 9G and identified and evaluated several other routing options. In May 2014, the RAC Subcommittee issued its recommendations in two reports: the first report addressed routing options in or near the BOPNCA (Boise RAC Subcommittee 2014a) and the second concerned the revised Draft MEP submitted by the Companies to the RAC Subcommittee in March 2014 (Boise RAC Subcommittee 2014b). The RAC Subcommittee recommendations were adopted by the Boise District RAC and forwarded on to BLM for action.

The development and evaluation of route options by the RAC Subcommittee considered a wealth of local knowledge and included the participation of members of the public, local and state

officials, and federal agencies (local and national-level). The Companies support the RAC Subcommittee recommended route options and have adopted these route options as the Companies current Proposed Routes as reflected in the August 2014 Standard Form 299 (SF299) revision and within this Draft MEP. The Companies have also incorporated some of the RAC Subcommittee recommendations for compensatory mitigation and enhancement within this Draft MEP.

Table 2, below, shows the numbers of miles of the BOPNCA (on BLM-managed lands) crossed by the Companies' current Proposed and the Final EIS BLM-Preferred alignments for Segments 8 and 9.

Table 2. Distances of Alternative Routes across BOPNCA on BLM-Managed Lands

Segment	Route	Miles	
		Total Length[1/]	Distance across BOPNCA (BLM and BOR)
8	BLM Preferred	132	2.0
	Proposed Route	129.4	17.9
9	BLM Preferred	171.4	11.2
	Proposed Route	161.4	46.0

[1/] Total length from Substation to Substation

Figure 1 shows the Proposed Routes for Segments 8 and 9 in red, which are consistent with the RAC Subcommittee recommended route options and the BLM's Final EIS Preferred Alternative as a black striped overlay on either red or green routes, as appropriate.

Although the ROD states that the Project's environmental protection measures would "conserve and protect NCA resources," BLM staff has emphasized that mitigation must bring the area back to baseline, which BLM staff has stated is above and beyond "conserve and protect NCA resources." Therefore, the Companies have included a compensatory mitigation component based on the long-term operational footprint of the Project to restore to the pre-construction or baseline at a minimum. The compensatory mitigation is beyond the standard mitigation or Project design features (presented in the BLM Plan of Development [POD] as environmental protection measures) that will be implemented and will offset residual effects. The Companies have further proposed an enhancement component to meet the enhancement requirement in the enabling legislation for the BOPNCA.

The Companies have provided a MEP that is scaled, where feasible, to the acres of direct impact on the NCA and allows for its consideration and approval *regardless of the alternative finally selected.* It is the Companies' intention to provide compensatory mitigation and enhancement in proportion to the impacts to the BOPNCA for any route that is approved, and to use the acres of construction disturbance as a surrogate to estimate proportional impacts.

For example, the routes selected as Preferred by the BLM in the Final EIS would disturb 351 acres during construction, as compared to 1,267 acres for the Companies' Proposed Route. If the BLM's Preferred Alternatives were selected, the funding within the Draft MEP would be scaled back to about 20 percent of the proposed funding for the Companies' Proposed Route.

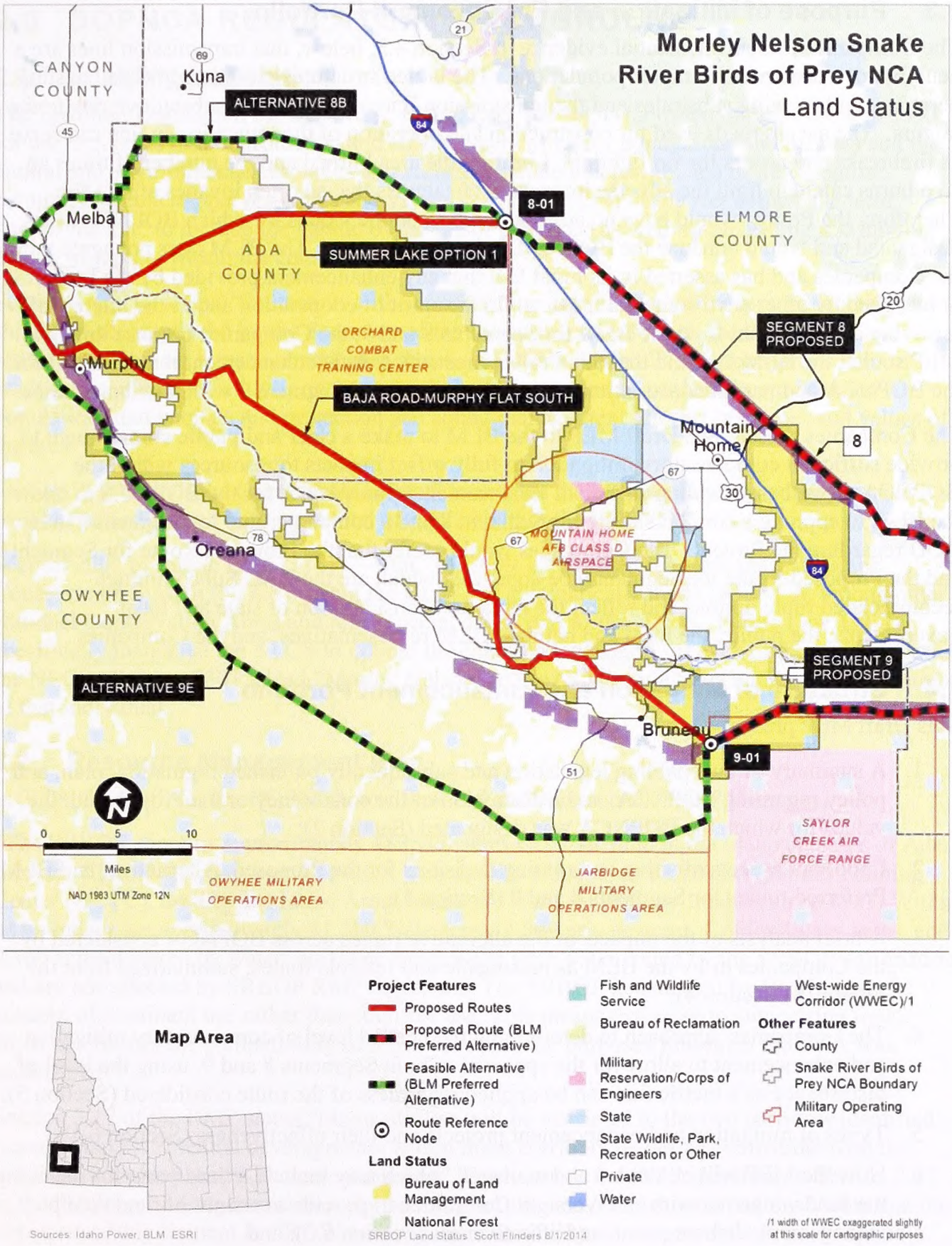

Figure 1. Land Status

1.3 Purpose of Mitigation and Enhancement Portfolio

The Companies present substantial evidence in Section 4.3, below, that transmission lines are a benefit, not a detriment, to raptor populations. The lattice structures provide additional nesting, perching, and roosting substrates and the transmission lines do not pose a substantive risk to the raptors. The access roads used for construction and operation of the transmission line can serve as firebreaks and access for firefighting. Limiting the area burned and the number of times an area burns can help limit the adverse impacts of cheatgrass that so often invades after a fire. Therefore, the Project would have no adverse impacts on the values for which BOPNCA was designated and would enhance the BOPNCA in important ways. The BLM does not agree with the Companies and has asserted in its Final EIS that any enhancement provided by the Project is outweighed by other environmental impacts. In the spirit of cooperation and in the interest of receiving a ROW grant from the BLM for Segments 8 and 9, the Companies propose this Draft MEP so that the BLM can find that this Project meets its stated "enhancement requirement" for the BOPNCA and permit construction of both Segment 8 and Segment 9 within its boundaries.

The Companies present this Draft MEP to the BLM to make a clear and public commitment to provide sufficient compensatory mitigation to fully offset impacts to resources within the BOPNCA as well as providing sufficient enhancement opportunities for the BOPNCA to allow the BLM to approve a complete route for Segment 8 and a complete route for Segment 9 in its ROD regarding the Project. The Companies would prefer that the Proposed Route for Segment 8 and the Proposed Route for Segment 9 be approved, which are the RAC Subcommittee recommended route options and reflect the input and consideration of state and local governments, the public, the local and national BLM representatives, and the Companies.

1.4 Structure of Mitigation and Enhancement Portfolio

This Draft MEP presents:

1. A summary of the enabling legislation and subsequently published regulation, plan, and policy regarding BOPNCA, and a discussion of the consistency of the Project with the values for which the BOPNCA was designated (Section 2);
2. Important aspects of siting and routing decisions for the Proposed, Alternative, and BLM Preferred routes for Segments 8 and 9 (Section 3);
3. A brief analysis of the impacts of the alternative routes across BOPNCA considered by the Companies or by the BLM as reasonable and feasible routes, summarized from the Final EIS (Section 4);
4. The Companies' approach to determining the needed level of compensatory mitigation and enhancement to allow for the approval of both Segments 8 and 9, using the level of disturbance as a metric that can be applied regardless of the route considered (Section 5);
5. Types of mitigation and enhancement projects and their effectiveness (Section 6.1);
6. How the MEP will be funded and managed, which may include a third party for receiving the funds, together with an Oversight Committee to provide oversight of fund receipt, management, disbursement, and effectiveness (Section 6.2); and
7. A monitoring and reporting program to allow for transparent disclosure of the use and effectiveness of the enhancement projects (Section 6.3).

2.0 BOPNCA REGULATORY BACKGROUND

2.1 Enabling Legislation

The Enabling Legislation for BOPNCA, Public Law 103-64, established the BOPNCA in 1993 for the "…conservation, protection and enhancement of raptor populations and habitats and the natural and environmental resources and values associated therewith, and of the scientific, cultural, and educational resources and values…." Section 2(4) of the Act defines the term "raptor habitat" to include the habitat of the raptor prey base as well as the nesting and hunting habitat of raptors within the conservation area.

Section 1((5)(D) states, "Protection of the conservation area as a home for raptors can best and should be accomplished by the Secretary of the Interior, acting through the Bureau of Land Management, under a management plan that: (…) (D) allows for diverse appropriate uses of lands in the area to the extent consistent with the maintenance and enhancement of raptor populations and habitats and protection and sound management of other resources and values of the area."

Section 2(4) defines the term "raptor habitat" to include the habitat of the raptor prey base as well as the nesting and hunting habitat of raptors within the BOPNCA.

Section 2002 of Public Law 111–11—Mar. 30, 2009, established the National Landscape Conservation System (NLCS) within the BLM and automatically made BOPNCA, among other National Conservation Areas and other special areas, part of the NLCS. Public Law 111-11 specifically mandated the NLCS to uphold the enabling legislation for each of the components of the NLCS. Section 2301 added "Morley Nelson" to the NCA's title to recognize the contribution of that individual.

2.2 Resource Management Plan

In 2008, the RMP for the BOPNCA was finalized and announced. The RMP states,

"The SRBOP contains approximately 483,700 acres of public land in the Idaho counties of Ada, Canyon, Elmore and Owyhee. The NCA includes the 138,000-acre Orchard Combat Training Center (OCTC), used by the Idaho Army National Guard for military training since 1953. Within its boundary are approximately 41,200 State acres, 4,800 private acres, 1,600 military acres, and 9,300 acres covered by water; however, these lands were not affected by the SRBOP designation and are not affected by SRBOP RMP decisions. The SRBOP is managed by BLM under the concept of dominant use rather than multiple use. This means that prior to authorizing uses, BLM determines the compatibility of those uses with the purposes for which the NCA was established."

Section 2.17 of the RMP states "Major utilities will be restricted to the two corridors identified (Lands Map 3). Potential developments within these corridors would be compatible with the purposes for which the NCA was established". Furthermore the RMP specifies, in Section 2.17 in the "Utility and Communication Corridor Objectives and Management Actions" table that the objective of this element is: "ROW authorizations for utility developments will be compatible with the purposes for which the NCA was established, emphasizing habitat protection with economic development." Lands Map 3 of the RMP specifies the two utility corridors to which all future utility development would be restricted. The RMP recognizes that utility corridors

meet the "economic development" component of the overall BLM mission and explicitly acknowledges that these corridors will be managed separately from the overall NCA, where habitat protection is the only goal. Note that these corridors also are part of the National Energy Corridors as required in the Energy Policy Act of 2005 and were explicitly designated for utilities. Furthermore, Page 2-26 of the RMP states that land use authorizations "will enhance or at least not adversely affect raptor populations or their habitat." As presented in the following sections, notably sections 2.4 and 4.3, the Project does not adversely affect raptor populations or their habitat and the Project itself provides and/or enhances opportunities for nesting, perching and roosting of raptor species and other birds of prey.

2.3 NLCS Management Strategy and Manuals (BLM 6100)

In October of 2011, the BLM completed the *National Landscape Conservation System 15-Year Strategy 2010-2025* to provide national-level guidance for managing the BLM's National Conservation Lands. The national strategy is organized around 4 major themes:

- Ensuring the conservation, protection, and restoration of NLCS values;
- Collaboratively managing the NLCS as part of the larger landscape;
- Raising awareness of the value and benefits of the BLM's NLCS; and
- Building upon BLM's commitment of conservation.

Each of the BLM State Offices in turn were asked to prepare a three-year strategy organized around and tiered to the same four themes outlined in the national strategy; the Idaho State Office has prepared a state strategy for 2012–2015 (*Idaho National Landscape Conservation System Strategy 2012–2015* (BLM no date). In July 2012, the NLCS issued several management manuals. The strategies and manuals were released well after the completion of route development for this Project.

The national and state strategy, as well as Manual 6100, allow for multiple uses that are consistent and/or compatible with the designating legislation. However, Manual 6100, Section 1.6(J)(4) Lands and Realty, also states,

"To the greatest extent possible, subject to applicable law, the BLM should through land use planning and project-level processes and decisions, avoid granting new ROWs through NLCS units …Subject to applicable law, the BLM shall exercise its discretion to deny ROW applications in NLCS units if the BLM determines the ROW proposals are:

a. inconsistent with the authority that designated the unit; or
b. incompatible with the protection of the values for which the unit was designated, subject to a compatibility determination by the authorized officer for the affected NLCS unit."

BLM Manual 6220 specifically addresses managing NCAs. This manual allows for uses that are compatible with the "…protection of the objects and values for which those areas were designated." (Section C.1). However, the manual also appears to make the assumption that rights-of-way are not compatible. Section E.1.e states "…to the greatest extent possible, subject to applicable law, through land use planning and project-level processes and decisions, the BLM should avoid sitting ROWs in Monuments and NCAs." Manual 6220 Section E.5 states "If new

ROWs are authorized in Monuments and NCAs, consistent with 43 CFR Parts 2800 and 2880 and to the greatest extent possible:

a. the ROW must share, parallel, or adjoin existing ROWs;

b. the effects of the projects from the grants of the ROW must be mitigated; and

c. the ROW should include a stipulation that boundaries will be marked to federal boundary standards."

When considering the national and state strategy and BLM manuals, it is clear that the BLM has contemplated the issuance of ROWs within the NCA as the BLM has established a process for doing so and criteria or requirements for managing the NLCS unit in this regard. Therefore authorizing ROWs for the Project within the NCA is allowable, and when factoring in the use of a designated utility corridor (see Section 3.2) and this MEP, the spirit and requirements of managing a NLCS unit are met and satisfied.

2.4 Consistency with Enabling Legislation and RMP

The enabling legislation allows for "diverse appropriate uses of lands in the area to the extent consistent with the maintenance and enhancement of raptor populations and habitats and protection and sound management of other resources and values of the area." The Companies believe that any of the proposed alignments considered for the purposes of this Draft MEP are consistent with the enabling legislation. The Companies believe that transmission lines crossing the BOPNCA do not impair the values for which the BOPNCA was established because:

1. Lattice structures are, in and of themselves, no hazard to raptors;
2. Lattice structures provide substantial perching, roosting, and nesting opportunities for many species of raptors and other birds of prey; and
3. 500-kV conductors are 1.5 inches in diameter and are bundled in a triangular configuration with spacing of 18 and 25 inches. The three conductor bundles are at least 39 feet apart from each other in the delta lattice tower configuration. There is negligible risk of collision with such large structures. There is no danger of electrocution as no raptor has a wingspan sufficient to touch two phases at once.

The Project conducted a rigorous routing and siting analysis "to develop proposed transmission corridors/routes and substation sites meeting the requirements of the Project purpose and need, minimizing or avoiding significant environment effects and meeting Project engineering and construction requirements" (IPC and RMP 2008). As such the routes developed through this analysis balanced the many contributing constraints, including potential impacts to raptors with routing and siting opportunities. Similarly, the analysis presented in the Final EIS considered the many constraints and opportunities, including those expressed and those which continue to be voiced during public involvement and comment on the Project, in order to balance potential impacts to all resources and the public. BLM must consider the "multiple-use mandate" and concept presented in the Federal Land Policy and Management Act (FLPMA) of 1976 for the overall Project, but must also respect the "dominant use" requirements of the enabling legislation and subsequent BLM regulation and policy.

No plan amendments are needed for the BLM's Preferred Routes for Segment 8. The BLM, in the Final EIS, stated that a single plan amendment would be required to permit the BLM-

Preferred Route for Segment 9 because it does not entirely lie within a designated utility corridor.

Table 3, below, lists the Companies' assessment of plan amendments required to permit the Proposed Routes.

The Proposed Route for Segment 8 requires amendments to allow construction outside the designated utility corridors and for surface disturbance within 0.5 mile of or within slickspot peppergrass habitat. For a detailed description of Proposed Segment 8, see Section 3.4.2.

The Proposed Route for Segment 9 requires amendments to allow construction outside the designated utility corridors, to cross the Cove NMA area in new double-circuit configuration along existing 138-kV alignment, for crossing the Snake River and C. J. Strike Special Recreation and Management Areas (SRMAs) and for visual impacts associated with the Snake River Canyon. For a detailed description of the Proposed Segment 9 route, see Section 3.4.2.

Table 3. RMP Amendments Needed by Route

Routes	RMP Amendment Needed for Conformance
Proposed 8	Allow the Gateway West Project outside the designated utility corridors.
	Gateway West will be allowed within 0.5 mile of occupied, sensitive plant habitat, with appropriate mitigation to protect sensitive plants, including slickspot peppergrass.
Proposed 9	Allow the Gateway West Project outside the designated utility corridors.
	Allow the Gateway West Project to cross the Cove non-motorized area.
	VRM Class II areas that are in view of the proposed powerline where micrositing would not sufficiently mitigate for VRM Class II impacts would be inconsistent with the VRM II classification and would be reclassified to VRM III. In these locations, VRM Class II areas within 250 feet of the route centerline would be reclassified to VRM Class III, taking into account the need for a 0.5 mile buffer distance from NHTs. Mitigation will include adjusting the alignment to ensure a 0.5 mile buffer from NHTs is maintained.
	Snake River SRMA: This SRMA consists of 15,900 acres in the Snake River Canyon downstream from Grandview, Idaho that is managed for the protection of cultural and scenic values. The SRMA designation has been reduced by approximately 6,400 acres to accommodate a major powerline.
	C.J. Strike SRMA: This SRMA consists of 16,900 acres surrounding C.J. Strike Reservoir along the Snake River. The purpose of the SRMA is to provide enhanced recreation management associated with the reservoir, and protection of the Oregon Trail adjacent to the reservoir. The SRMA designation has been reduced by approximately 3,100 acres to accommodate a major powerline ROW.
	Retain all public lands in the 43,000-acre ROW avoidance area to protect the visual corridor along the historic Oregon Trail and the resources along the Snake River canyon. Allow the Gateway West Transmission Line Project with mitigation as appropriate based upon Section 106 consultation."

3.0 SITING AND ROUTING CONSIDERATIONS FOR SEGMENTS 8 AND 9

3.1 Existing Transmission Lines across BOPNCA

The BOPNCA was designated in 1993, after several dams had been constructed to provide clean hydroelectric power for Idaho and other Western states on the Snake River and after several transmission lines had been built along and across the Snake River within the boundaries of the designated National Conservation Area to convey that power and other power sources to and through Idaho. One of those dams, Swan Falls, is within the BOPNCA, and there are about 23.9 miles of lattice tower 500-kV, 0.7 mile of lattice tower and H-frame 230-kV, and 90.7 miles of lattice tower and H-frame 138-kV transmission lines presently within the BOPNCA. Figure 2 shows underlying topography, the location of the Swan Falls dam, and the existing high-voltage (138-kV or greater) transmission lines within the BOPNCA.

During development and refinement of the routes considered for this Project, the Companies were encouraged by multiple stakeholders, including land managing agencies, to take opportunities to route adjacent to existing lines where possible. Routing opportunities were few for this Project and while routes were developed to take advantage of opportunities, the location of routes and development of alternatives was driven by the numerous routing constraints, including sensitive resources and stakeholder concerns and priorities. The Companies worked with federal and state resource agencies and stakeholders to develop routes that addressed the numerous resource issues and stakeholder concerns associated with routes in the BOPNCA and adjacent areas; the stakeholder effort is summarized in Section 3.3. Since this effort, the Companies have stated:

1. a willingness to implement 250 feet of separation between the proposed 500-kV line and existing Midpoint to Hemingway Transmission line in Segment 8; and
2. the ability to double circuit portions of the proposed 500-kV line with existing 138-kV lines; within and near the BOPNCA. These two factors have greatly influenced the development of the Proposed Routes for Segments 8 and 9.

3.2 National Energy Corridor Designation

Two National Energy Corridors were designated across BOPNCA in a ROD signed by the BLM in January 2009 in response to the Section 368 of the Energy Policy Act of 2005, requiring the Secretary of the Interior to designate energy transport corridors on Federal land under existing authorities, such as those provided by the FLPMA. Those corridors include portions of both the Proposed and Preferred Routes for Segment 8 (east of Mountain Home) and Segment 9 (east of Bruneau and north of Murphy) as shown on Figure 1.

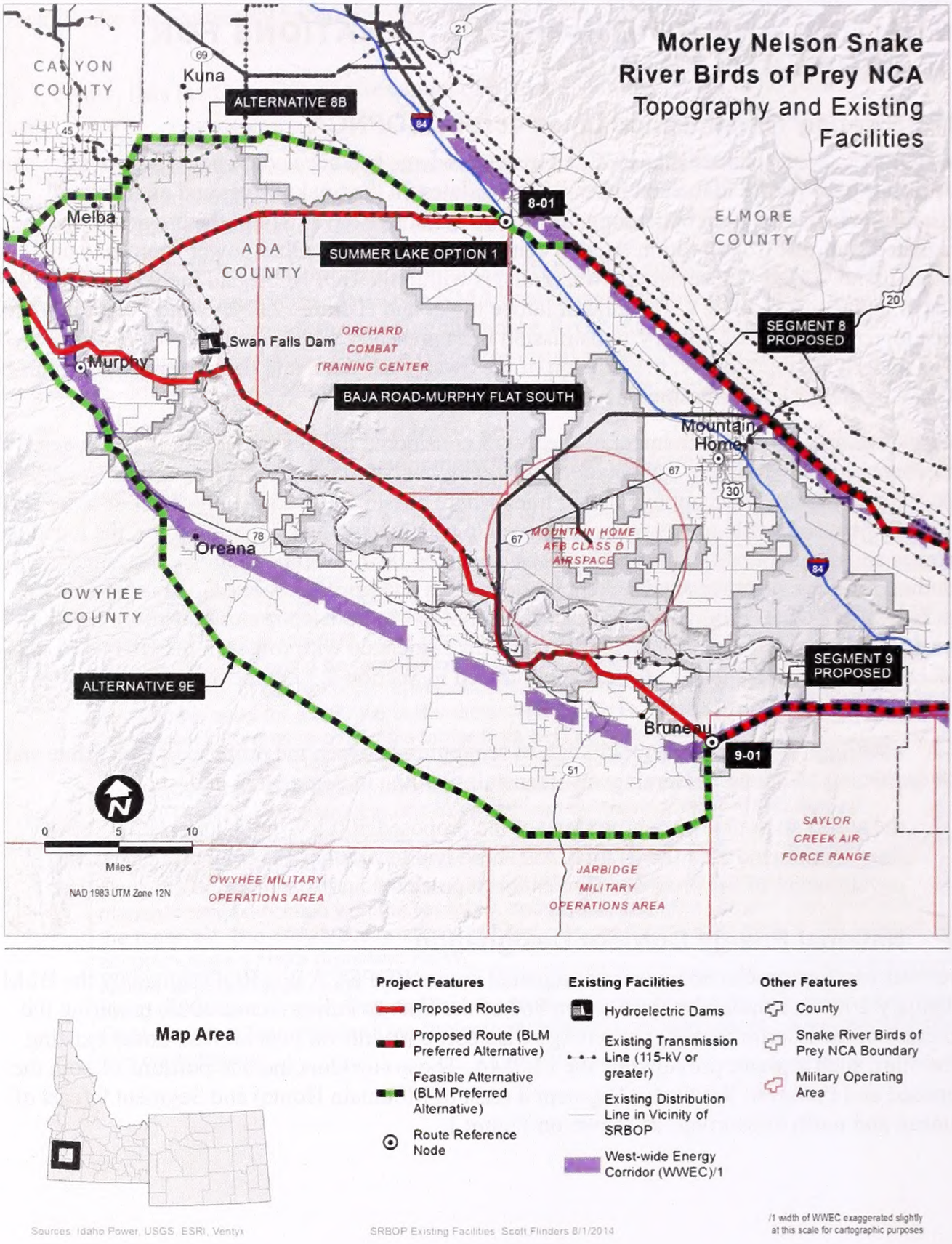

Figure 2. Topography and Existing Facilities

This 2009 Energy Corridor ROD, which amended several RMPs that covered the BOPNCA area at the time of the writing of the designation of corridors, states:

"Designation of Section 368 corridors and amendment of affected RMPs does not authorize any projects, mandate that future projects be confined to the corridors, or preclude BLM from denying a project in a designated corridor or requesting design revisions to meet unanticipated siting issues there. Future ROW proposals will need to comply with other applicable laws, regulations, and policies. ROW applicants will not be prevented from proposing projects outside the designated corridors for BLM's consideration, although such proposals may need to go through the land use plan amendment process to be accommodated."

During the final development of the National Energy Corridors, then-director of the BOPNCA, John Sullivan, worked with the national team to adjust the Corridor near Bruneau Dunes State Park to recognize that the Corridor would likely not be successful across a state park. The final corridor east of Bruneau, as declared, was developed, in part, to accommodate the Gateway West Project.

The intent of the National Energy Corridors, as reflected in the BOPNCA RMP, was to designate routes that would be, *by definition*, compatible with the underlying land management of the area. While it does not exempt a project located within the corridor from any aspect of NEPA or other federal consultation requirements, it does relieve it of a need, to the extent that it occupies this corridor, of seeking any land management plan amendments to permit the project. If a transmission line, *by definition*, is compatible with the underlying land management, it is reasonable to assume that the land managers recognize and accept the trade-off between economic development and other values in the NCA. This is an important point to the Companies, who are proposing to mitigate for impacts, even within the corridor, and to offer enhancement elements, even within the corridor, but at a lower ratio than outside the corridor.

3.3 Summary of Companies' Consensus-Building Siting Work

The Companies originally proposed to build Segments 8 and 9 entirely outside the BOPNCA except where the National Energy Corridors explicitly allowed for transmission line construction (JPC & RMP 2008). When the BLM initiated scoping meetings in May of 2008, numerous concerns were raised by local landowners, stakeholders, and governments raised numerous concerns regarding the placement of Segments 8 and 9. Based on a series of BLM- and Companies-sponsored meetings held in the vicinity of the proposed routes, several alternatives were developed.

As stated in a memo from the BLM accepting a revised siting study, "BLM has received a revised siting study dated December 30, 2009 from the Proponents of the Gateway West Transmission Line Project and received January 6, 2010. This supplemental study focuses on the alternatives that have been proposed by cooperating agencies and task forces and that were submitted to the BLM on or before September 4, 2009. In several cases, the Proponents made changes in their Proposed Routes based on those alternatives, and on October 6, 2009 provided the BLM with a memo explaining changes in the Proposed Route and providing preliminary recommendations regarding proposed alternatives."

The Companies worked with local stakeholders and local BLM representatives across multiple venues for several years in an attempt to find a route that could be acceptable to all parties participating in these discussions. A summary of meetings held is found in Table 4, below.

Based upon the results of the consensus building meetings as identified in Table 4, the Companies revised their Proposed Route for Segment 8 to cross the BOPNCA parallel to the south side of the existing 500-kV Midpoint to Hemingway transmission line, based in part on a recommendation from the city of Kuna and adjacent landowners and stakeholders. The IDANG raised concerns regarding the crossing of the Alpha Maneuvering Sector of the OCTC, and the Companies responded by completing a feasibility study of rerouting the Midpoint to Hemingway transmission line to the north of the sector and routing Alternative 8D parallel to the Midpoint to Hemingway alignment through the BOPNCA. The BLM raised serious concerns regarding the Proposed Segment 8 crossing of the Snake River due to the sensitivity of the area and the Companies responded by completing a feasibility study and preliminary design for Alternative 8E which provides an alternative crossing, well south of the area of concern, that still largely followed existing transmission lines.

Boise RAC Subcommittee

Most recently the Companies supported the Boise RAC in their evaluation of the Draft MEP and route options in and/or near the BOPNCA. The Companies participated in 11 Boise RAC public meetings. In addition to the meetings the Idaho Governor's Office of Energy Resources led two public field tours in and around the BOPNCA in order to assist with the evaluation and development of route alternatives (Boise RAC Subcommittee 2014a). During the course of these meetings, the Companies provided requested input and technical expertise regarding the engineering feasibility of Boise RAC evaluated route options, the purpose and need of the Project and the Draft MEP.

As stated in the 2014 Boise RAC report on route option in and/or near the BOPNCA,

> "Many of the public who attended meetings stated that they appreciated the process that the subcommittee was using to evaluate several route options in and around the BOPNCA. Several members of the public stated that they are against locating the 500-kV transmission line near dairies, irrigated/pivot agriculture, and residences. Most of the public comments received by the subcommittee were supportive of routes going through the BOPNCA with appropriate mitigation and enhancement."

Through this additional public evaluation process established by the BLM through adherence of the Project's ROD, the Companies believe that the Boise RAC recommended route options will be generally supported by local authorities and the public and represent a good local consensus on route location. The Companies have adopted the RAC recommended route options as their Proposed Routes within and near the BOPNCA.

Table 4. Companies' Siting and Routing Meetings

Date	Title	Location	Public (Y/N)	Staff	Attendees	Number of Attendees
12/15/2008	Murphy Landowner Meeting	Murphy, ID	Y	**IPC Staff**: Doug Dockter, Todd Adams, Kristi Pardue, Lynette Berriochoa, Scott Johnson, Mike Ybarguen, Mark Lupo **RMP Staff**: Shawn Graff **TT Staff**: Jim Nickerson, Susan Hayman, Diann Strom	Landowners	54
4/8/2009	Kuna City Officials Meeting	Kuna, ID	Y	**IPC Staff**: Kristi Pardue, Doug Dockter, Stephanie McCurdy, Lynette Berriochoa, Denny Trumble	BLM, Kuna City Officials	15
4/9/2009	Owyhee County Planning and Zoning Commission Meeting	Murphy, ID	Y	**IPC Staff**: Mike Ybarguen, Brent Lulloff	Administrator Mary Huff	
4/15/2009	Community Conversation	Gooding, ID	Y	**IPC Staff**: Todd Adams, Dan Olmstead, Gerald Orthel, Paul Ortmann **RMP Staff**: Shawn Graff **BLM Staff**: Lori Armstrong, Mike Courtney, Debbie Kovar, Jeff Steele, Jim Tharp **TT Staff**: Walt Vering, Diann Strom, Mike Takac	Landowners, targeted toward dairy farmers	5
4/23/2009	City of Kuna Engineering Department Meeting	Kuna, ID	Y	**IPC Staff**: Todd Adams, Justin Hitt **TT Staff**: Jim Nickerson	Gordon Law, Steve Hasson and Mayor Scott Dowdy	5
4/30/2009	Bruneau Town Hall Meeting	Bruneau, ID	Y	**IPC Staff**: Doug Dockter, Kristi Pardue, Blake Watson, Layne Dodson, Lynette Berriochoa **TT** Staff: Jim Nickerson, Ray Outlaw, Carl de Simas	County Commissioners, State Representatives, interested landowners	96
5/5/2009	Grand View Meeting		N	**IPC Staff**: Blake Watson		
6/3/2009	Town Hall Meeting	Melba, ID	Y	**IPC Staff**: Kristi Pardue, Doug Dockter, Todd Adams, Layne Dodson, Mike Ybarguen, Lisa Grow, Lynette Berriochoa, Rich Hahn, **RMP Staff**: Pam Anderson **BLM Staff**: John Sullivan, Aiden Seidlitz **TT Staff**: Jim Nickerson, Diane Adams, Ara Swanson	County Commissioners, State Representatives, interested landowners	95
6/11/2009	Town Hall Meeting	Kuna, ID	Y	**IPC Staff**: Kristi Pardue, Doug Dockter, Todd Adams, Layne Dodson, Mike Ybarguen, Bryan Wewers, Marsha Leese, Blake Watson, Rich Hahn **RMP Staff**: Pam Anderson, Shawn Graff **BLM Staff**: John Sullivan, Rosey Thomas **TT Staff**: Jim Nickerson, Walt Vering, Diane Adams, Carl de Simas	Ada County Commissioners, City of Kuna officials, general public, landowners, media	72

Table 4. Companies' Siting and Routing Meetings (continued)

Date	Title	Location	Public (Y/N)	Staff	Attendees	Number of Attendees
6/15/2009	City of Kuna Working Session		N	**IPC Staff**: Justin Hitt, Todd Adams **BLM Staff**: representatives		
6/18/2009	Owyhee County Committee Meeting	Grand View, ID	Y	**IPC Staff**: Todd Adams **TT Staff**: Walt Vering	Interested landowners and residents	
7/6/2009	Landowner Meeting	Kuna, ID	Y	**IPC Staff**: Justin Hitt **BLM Staff**: representatives	Ada County landowners (Kuna and Melba), BLM	
7/16/2009	Town Hall Meeting	Glenns Ferry, ID	Y	**IPC Staff:** Todd Adams, Kristi Pardue, Justin Hitt, Blake Watson **BLM Staff:** John Sullivan, Holly Hampton, Jeff Steele **RMP Staff:** Shawn Graff **TT Staff:** Jim Nickerson, Susan Hayman, Diane Adams	County commissioners, Glenns Ferry mayor, interested landowners	59
7/21/2009	Town Hall Meeting	Jerome, ID	Y	**IPC Staff:** Dan Olmstead, Gerald Orthell, Paul Ortmann **BLM Staff:** Holly Hampton, Jeff Steele **TT Staff:** Jim Nickerson, Diane Adams	County commissioner, interested landowners	19
7/22/2009	Town Hall Meeting	Gooding, ID	Y	**IPC Staff:** Dan Olmstead, Gerald Orthell, Paul Ortmann **BLM Staff:** Holly Hampton, Jeff Steele **TT Staff:** Walt Vering, Diane Adams		28
8/4/2009	Ada County Task Force Meeting		N	**IPC Staff:** Todd Adams, Justin Hitt **BLM Staff:** representatives	Charlie Baun	
8/11/2009	Owyhee County Meeting	Grand View, ID	N	**IPC Staff:** Todd Adams, Justin Hitt		
8/12/2009	City of Kuna Meeting	Kuna, ID	N	**IPC Staff:** Todd Adams		

Table 4. Companies' Siting and Routing Meetings (continued)

Date	Title	Location	Public (Y/N)	Staff	Attendees	Number of Attendees
8/19/2009	Ada Congressional Meeting	Kuna, ID	Y	**IPC Staff**: Layne Dodson, Rich Hahn **BLM Staff**: John Sullivan	Dale Willis (Owyhee County property owner), Charlie Baun (ECS meeting facilitator), Jed Jones (Osprey Ridge property owner), Duane Yamamoto (Kuna property owner), Owyhee County Commissioner Jerry Hoagland, Canyon County Commissioner Kathy Alder, Ada County Commissioner Rick Yzaguirre, Ada County Commissioner Fred Tillman, Ada County Commissioner Sharon Ullman, Matt Ellsworth (representing Senator Risch), Brian Ricker (representing Senator Crapo), Tom Schwaz (representing Representative Minnick), District 23 Representative Steve Hartgen, Frank Bachman (Bruneau property owner), Lavar Thornton (Kuna property owner), Bob Davenport (Kuna/Melba property owner), Sid Anderson (City of Kuna), Steve Hasson (City of Kuna), Craig Moore (City of Melba), Burl Smith (City of Melba), Klinchew (City of Melba)	
8/28/2009	Kuna Task Force Meeting		N	**IPC Staff**: Justin Hitt **BLM Staff**: representatives	Charlie Baun	
11/10/2009	Community Conversation	Mountain Home, ID	Y	**IPC Staff**: Todd Adams, Justin Hitt, Randy Lane, Kristi Pardue, Denny Tremble, Blake Watson **RMP Staff**: Pam Anderson, Shawn Graff **BLM Staff**: John Sullivan, Jeff Steele **TT Staff**: Diane Adams, Adair Muth	County commissioners, interested landowners, state representatives, staff from federal delegation	38
11/12/2009	Community Conversation	Kuna, ID	Y	**IPC Staff**: Todd Adams, Kristi Pardue, Layne Dodson, Justin Hitt, Piper Hyman, Randy Lane, Brent Luloff, David Thornton, Denny Tremble **RMP Staff**: Pam Anderson, Shawn Graff **BLM Staff**: John Sullivan, Jeff Steele **TT Staff**: Diane Adams, Adair Muth	County commissioners, interested landowners, state representatives, staff from federal delegation	68

The Companies have spent several years and many hundreds of hours in meetings with resource agencies and listening to diverse stakeholders and responding with alternative routes. While there will never be a perfect route that pleases everyone for a large and complex project like Gateway West, the Companies ask the BLM to seriously consider the RAC recommendations, which the Companies have adopted as their Proposed Routes. The Companies believe that these routes, in conjunction with this August 2014 MEP, will allow the BLM to authorize Segments 8 and 9 through the issuance of a ROD and ROW Grant.

3.4 History of Formal Proposed Actions and BLM Preferred Alternatives

3.4.1 Rationale for crossing the BOPNCA

The fundamental rationale for proposing alternatives that cross the BOPNCA has several components:

- The Project's purpose, in part, is to connect the Midpoint and Hemingway substations with Segment 8 and the Cedar Hill and Hemingway substations with Segment 9. Given the location of these substations, it is impractical to entirely avoid the BOPNCA.
- To the extent feasible, the Project, along its 990-mile length, has been proposed to follow National Energy Corridors, state-designated corridors, utility corridors designated by BLM management plans, or to parallel existing transmission lines. This approach limits proliferation of transmission lines across the landscape and confines impacts to areas already impacted by similar utilities, a stated national goal of federal land managers (BLM 2009).
- There are two National Energy Corridors, confirmed and included in the BOPNCA RMP as utility corridors, designated across the BOPNCA. Utilization of these corridors is encouraged by BLM national policy and by the BOPNCA RMP and was employed wherever possible during siting and routing.
- Although all uses of the BOPNCA must conform with the enabling legislation to be considered, the Companies feel that the RAC-recommended Routes that the Companies have adopted as their Proposed Routes across the BOPNCA fundamentally do conform with the enabling legislation, that the transmission line does not adversely affect the resources and values for which this element of the NLCS was designated, and that when considered with this Draft MEP, mitigates impacts and enhances raptor populations, cultural, and scientific resources, which are elements of the enabling legislation.

The Companies therefore propose to the BLM that the Proposed Routes for Segments 8 and 9 be approved through the BOPNCA. Though the Companies believe that the project does not have an adverse effect on raptor populations, including the raptor prey base, and that no enhancement should be required, in the spirit of cooperation offer this Draft MEP to allow the BLM to approve routes across the BOPNCA as specified in the November 14, 2013, ROD for the Project. In support of these Proposed Routes, the Companies are submitting a revised SF299 and detailed Plan of Development Supplement describing the route location, proposed facilities, facilities to be removed and activities associated with construction and operation within and near the BOPNCA, of which this document is a part.

3.4.2 Project Siting History

In October 2007, the Companies submitted a preliminary application for a ROW from the BLM, which contained a project description with tentative proposals for the ten segments of the Project. A map was included that showed the substations to be interconnected and two-mile-wide study corridors that connected the substations, because the Companies wanted to work cooperatively with the BLM and other agencies, counties, and local landowners to develop the route details. The first siting study was published in September 2008 after the public scoping meetings had provided initial input. Supplemental siting studies were published in October 2008 and December 2009 responding to agency and stakeholder comments. The Companies have continued to work collaboratively with the BLM and other agencies through the six-year NEPA process and continue to work with the stakeholders to resolve the final issues and receive approval for Segments 8 and 9.

For each stage of the NEPA process, the Companies have responded to concerns and made practicable changes in routes and environmental measures, providing formal notification of these changes in a revised Project Description within a revised POD. POD revisions have been filed in August 2008 and May 2009 to support the pre-EIS scoping and alternatives development, January 2010 to support the Draft EIS, February 2012 and January 2013 to support the Final EIS, August 2013 to support the ROD, and August 2014 to support the Supplemental EIS for Segments 8 and 9, of which this document is a part.

Specifically for Segments 8 and 9, the Companies have worked closely with the Boise District RAC Subcommittee as it has reviewed a March 2014 version of this document and the Companies' proposed routes through the BOPNCA.

3.4.2.1 Siting Study 2008

The Companies held, or participated in, a series of Project kickoff meetings to solicit agency input, which included input from the BPONCA representatives. The Companies met with representatives of the BOPNCA and USAF Saylor Creek Bombing Range to propose a specific alignment that would minimize effects on the Bruneau Dunes State Park and not compromise the military training mission. Considering this, environmental constraints, existing transmission congestion, and topographical constraints, among other considerations, two primary parameters were developed that affected high-level routing decisions with respect to Segments 8 and 9, these were 1) that the BOPNCA be avoided to the extent practical to be consistent with BLM's RMP, and 2) that the new corridor follow an existing utility corridor or the West-wide Energy Corridor (WWEC) where possible. Portions of the routes that were located within the BOPNCA but that were also within the WWEC were not considered a disadvantage at the time (IPC and RMP 2008). Based on those factors, the Companies proposed the following routes within and near the BOPNCA in 2008:

Segment 8 – A route that substantially avoided the BOPNCA by locating through the City of Kuna; similar to the BLM Preferred Alternative identified in the Final EIS.

Segment 9 – A route that followed the WWE Corridor through the BOPNCA, identified as the Proponents' Proposed Route in the Final EIS.

3.4.2.2 Siting Study December 2009, SF-299 to support Draft EIS

The second supplement to the siting study, published December 2009, incorporated consideration for concerns expressed by local cooperating agencies and the public during extended scoping for the Project after local cooperating agencies had reviewed the administrative draft of the EIS. This supplement was formally submitted as a project description change through an SF299 filed in January 2010 to support the Draft EIS.

Segment 8 – The Companies documented as their Proposed Route for Segment 8 a location through the BOPNCA south of the existing Midpoint to Hemingway 500-kV transmission line. This decision was based on collaboration with representatives of Melba, Kuna, Ada County, and BLM to reach a mutually acceptable solution.

Segment 9—The Companies documented as their Proposed Route for Segment 9 the route that largely follows the WWE Corridor and is within the WWE Corridor. Location for the Proposed Route was negotiated and agreed to among the Companies, Bruneau Dunes State Park, the Air Force, and BLM to avoid both the park and the Saylor Creek Bombing Range.

3.4.2.3 POD to Support the Final EIS and ROD (January and August 2013)

No substantive changes were made between the Draft and Final EIS to the Proposed Route for Segments 8 and 9.

3.4.2.4 Modified March 2014 MEP Proposed Routes

After the FEIS was issued, the Companies, considering the feedback from the BLM and public, modified the Final EIS Proposed Routes. The Companies did not submit these route modifications formally to the BLM, but provided them in conjunction with an earlier version of the Draft MEP as a comment to the Final EIS during the public comment period.

Segment 8 –The Companies modified the Final EIS Proposed Route for Segment 8 to include Alternatives 8D and 8E, which were proposed to avoid the Alpha Sector and the problematic crossing of the Snake River and the Halverson NMA, respectively.

Alternative 8D would not be in conformance with the management direction provided in in the BOPNCA RMP for sensitive plant habitat and for placing the transmission outside of the designated utility corridors, but would be in conformance with the resources and values for which the BOPNCA was originally It would also avoid impact to the IDANG and their training program.

Alternative 8E was proposed by BLM to avoid the Halverson Bar and Wees Bar Non-motorized Areas and an avoidance area associated with a National Register Historic District. Alternative 8E would minimize but not entirely eliminate indirect or visual impacts to cultural sites. While Alternative 8E crosses a small portion of the mapped avoidance area, it avoids direct impacts to known resources. It would follow the existing 138-kV transmission line along the Snake River on the east side and across the river, only leaving existing lines on the short leg from the river crossing north to where it reconnects with the Proposed Route (See Figure 2)

Alternative 8E would not be in conformance with the management direction provided in the BOPNCA RMP for sensitive plant habitat, utilization of existing corridors, and protections for visual resources, but would be in conformance with the resources and values for which the BOPNCA was originally designated.

Segment 9 – During the siting and routing discussions and meetings with the various task forces formed by local landowners, governments, and the local BLM (see Section 3.3), additional alternatives for Segment 9 were considered. The Owyhee County task force proposed Alternative 9D, which parallels an existing line within the BOPNCA, and the BLM, in response to concerns raised by that proposal, proposed Alternative 9G. The Proposed Route as modified by Alternative 9G was termed the "consensus" route for Segment 9.

Owyhee County had indicated that it preferred to see the project located well within the BOPNCA, following an existing transmission line, in part because the County believes that the Proposed Route would have significant detrimental effect on the County's landowners, farmers, economy, future development, and its tax base. Alternative 9D is a variant of an alternative identified by the Owyhee County Task Force. Avoidance of private lands and maximizing the use of public land was the primary sitting criteria. The specific alignment was developed through consultation between the BLM representatives and the Proponents based on information originally provided by the Task Force. This alternative substantially deviates from the designated WWE corridor (which is followed by the Proposed Route) and would cross 47.9 miles of the BOPNCA (thereby requiring an RMP amendment).

Alternative 9G is a further variant of Alternative 9D, recommended by local BLM staff. This alternative is generally coincident with Alternative 9D, but crosses the Snake River to the south to avoid potential routing issues with the Segment 8 crossing of the Wees Bar and Halverson Bar Non-Motorized Areas. It was developed in close coordination with landowners, Owyhee County, the State of Idaho, and the Field Office and BOPNCA staff of the BLM.

3.4.2.5 RAC Recommended Alternatives

In May 2014, the RAC Subcommittee issued its recommendations in two reports: the first report addressed routing options in or near the BOPNCA (Boise RAC Subcommittee 2014a) and the second concerned the revised Draft MEP submitted by the Companies to the RAC Subcommittee in March 2014 (Boise RAC Subcommittee 2014b). The RAC Subcommittee recommendations were adopted by the Boise District RAC and forwarded on to BLM for action.

The development and evaluation of route options by the RAC Subcommittee considered a wealth of local knowledge and included the participation of members of the public, local and state officials, and federal agencies (local and national-level). The Companies support the RAC Subcommittee recommended route options and have adopted these route options as the Companies current Proposed Routes as reflected in the August 2014 Standard Form 299 (SF299) revision and within this Draft MEP. The Companies have also incorporated some of the RAC Subcommittee recommendations for compensatory mitigation and enhancement within this Draft MEP.

Segment 8 Proposed Route

The Segment 8 Proposed Route (RAC Summer Lake Option 1) begins at MP 0.0 (MP 91.4 of the overall Segment 8 route and identified as 8-01 in Figure 1) and generally parallels the existing Midpoint to Hemmingway 500-kV transmission line, running about 1,500 feet south of the line before turning northwest and then crossing the existing line at MP 7.1. From there, the alignment generally parallels 250 feet north of the existing line the remaining 30 miles into the Hemingway Substation. At MP 8.2, the alignment crosses into the BOPNCA and follows the existing Midpoint to Hemmingway 500-kV transmission line for approximately 8 miles, north of

the boundary to the OCTC. At MP 12.7, the alignment crosses Pleasant Valley Road and continues west for approximately 3.5 miles. To avoid new agricultural impacts on private property and to minimize impacts to the OCTC's tank maneuver Alpha Sector, the alignment shifts south 250 feet at MP 16.2 and assumes the existing ROW of the Midpoint to Hemmingway 500-kV transmission line. A 1.1-mile section of the existing Midpoint to Hemingway line would be rebuilt 250 feet south within the Alpha Sector. At MP 16.8, the two routes resume their previous alignments, with the new Summer Lake Option 1 route 250 feet north of the existing Midpoint to Hemmingway 500-kV line. The route crosses Swan Falls Road at MP 22.2 and the existing Bowmont to Canyon Creek 138-kV transmission line at MP 22.9. At MP 27, the alignment turns west (still parallel to the existing line), leaving the BOPNCA at MP 27.2, and crosses 2 miles of irrigated agriculture at the Canyon and Ada County lines, north of Celebration County Park, before crossing the Snake River between MPs 30.9 and 31.3 at the southern end of Noble Island. The alignment then turns northwest and parallels the existing line for approximately 5 miles (crossing Hemingway Butte at MP 35.2), before turning north through the existing China Gulch subdivision and into the Hemingway Substation.

Segment 9 Proposed Route

The Segment 9 Proposed Route (RAC Baja Road-Murphy Flat South) generally follows the previous alignment for Proposed Route 9 for the first 90 miles and then Alternative 9G studied in detail in the Final EIS. Beginning south of Bruneau Dunes State Park, within the BOPNCA, the route leaves the established utility corridor in a northwesterly direction, crossing State Route (SR) 51 at MP 5.5, and leaving the BOPNCA at MP 6.7. At MP 10.3, the route re-enters the BOPNCA, double-circuiting with the existing C.J. Strike to Bruneau Bridge 138-kV transmission line near or on the current ROW for approximately 3.3 miles. At MP 14, the two circuits separate for approximately 0.2 mile to permit a more feasible crossing of the Narrows between C.J. Strike Reservoir and the Bruneau Arm. On the west side of the Bruneau River, the two lines again become a double-circuit line across the Cove non-motorized and recreation areas, west approximately 2.1 miles to the C.J. Strike Dam, where the existing 138-kV line double-circuits with the existing Evander Andrews to C.J. Strike 138-kV line north toward Mountain Home. The route parallels the existing double-circuit 138-kV line approximately 200 feet to the west for 4 miles, crossing the Snake River down river of the C.J. Strike Dam between MPs 17 and 18. At MP 20.8, the alignment shifts west, and then north again, to avoid encroachment in the Mountain Home Air Force Base controlled airspace and to avoid new impacts to private agricultural lands. At MP 24.8, the alignment crosses the Grand View Highway and then joins the existing Bowmont to Canyon Creek 138-kV transmission line in a new double-circuit alignment along the south side of the Big Baja Road. The new double-circuit alignment proceeds northwest, generally parallel to Big Baja Road and adjacent to the southern boundary of the OCTC, for 20.2 miles to a location southeast of Swan Falls and north of Tick Basin. Here the two circuits separate before crossing the Snake River canyon between MPs 47.3 and 47.8 near the existing Sinker Creek to Tap 138-kV transmission line crossing south of Sinker Butte. On the west side of the canyon, the route turns briefly south, parallel to the existing 138-kV line, and then turns west adjacent to the existing Sinker Creek Substation access road. At MP 50.8, the route turns northwest along the east and west faces of several low hills to minimize impacts to irrigated agriculture and to the Oregon National Historic Trail. Near MP 56, the route descends off of the Murphy Rim and crosses the Con Shea Basin north of Murphy. After crossing SR 78 at MP 57.7 north of the Rabbit Creek trailhead, the alignment rejoins the original

Segment 9 Proposed Route and continues in a northwesterly direction for approximately 9.5 miles into the Hemingway Substation.

3.4.3 BLM Preferred Alternatives

The Draft EIS issued in July 2011 did not identify a BLM Preferred Alternative (BLM 2013a). Rather the Draft EIS recognized that Gateway West represented the largest and most complex proposed high-voltage transmission line in the western United States and recognized that there is no impact-free route choice for a large transmission line reporting that "In some segments of the Gateway West Project, where there are multiple resource conflicts, alternative routes often show dramatically different impacts on certain resources, and some alternatives were put forward to emphasize protection of one resource or land value over another. There are substantial segments of the public than have not had a chance to express their opinions on the issues and alternatives so far proposed. It is reasonable to expect those entities to propose additional alternatives or perhaps to present new information on alternatives currently considered."

Following issuance of the Draft EIS, the BLM conducted 17 open house meetings and held a 90-day comment period to receive public comments. The BLM also met with counties, local task forces, and state and federal agencies to resolve issues raised by these entities.

Segment 8 – BLM Preferred Alternative

The BLM's Preferred Alternative follows the Proposed Route for Segment 8 for approximately 92 miles and then follows Alternative 8B to the Hemingway Substation. The Preferred Alternative generally avoids crossing the BOPNCA and the IDANG OCTC, but adversely affects private lands and slickspot peppergrass habitat to the north of the BOPNCA. The BLM selected the Proposed Route and Alternative 8B as its Preferred Route because this alignment:

- Follows designated corridors and existing linear infrastructure for approximately 76 percent of its length;
- Generally avoids the BOPNCA (crossing a 2-mile portion of it within an approved utility corridor), and it is likely the enhancement requirements of the BOPNCA enabling legislation that created the National Conservation Area (P.L. 103-64, Sec. 1(5), 3(a)(2), and 4(a)(2)) can be met in this area;
- Avoids the IDANG OCTC; and
- Avoids a National Register Historic District.

Segment 9 – BLM Preferred Alternative

The BLM's Preferred Alternative combines the Proposed Route for Segment 9 with Alternative 9E, which avoids private lands to the southwest of the BOPNCA but is longer and impacts more sagebrush habitat in Owyhee County. The BLM selected the Proposed Route and Alternative 9E (revised) as its Preferred Route because this alignment, as it relates to the BOPNCA:

- Follows a pinchpoint between the Saylor Creek Training Area and Bruneau Dunes State Park. A total of 8.8 miles of the alignment through this pinchpoint is unavoidably located on public land in the BOPNCA. However, 6.7 miles of that alignment is in a designated corridor on public lands within the BOPNCA. It is likely that the impacts on the BOPNCA in this area can be mitigated to meet the enhancement criteria of the enabling legislation. Alternative 9E does deviate a distance of 2.2 miles outside of this corridor to

avoid private lands just west of the BOPNCA boundary. A proposed land use plan amendment would allow this portion of the alignments outside of the designated corridor;

- Avoids the BOPNCA, except where it is located in the above the pinchpoint and for 2.5 miles between Oreana and Murphy, Idaho, to avoid sage-grouse preliminary priority habitat (PPH). A total of 1.5 miles of the 2.5 miles in the BOPNCA between Oreana and Murphy is located in a designated corridor on public land, and it is likely that the impacts on the BOPNCA in this area can be mitigated to meet the enhancement criteria of the enabling legislation. A proposed land use plan amendment would allow this portion of the alignment outside of the designated corridor; and
- Is not located in sage-grouse PPH.

The BLM has indicated that even its own Preferred Alternatives for Segments 8 and 9 would require offsetting mitigation and an enhancement offering to be considered in a BLM decision. The Companies do not agree. The BLM Preferred Alternatives largely follow designated utility corridors, which are National Energy Corridors, through the BOPNCA. The enabling legislation and the RMP both explicitly permit such crossings, and the RMP explicitly states that locating utilities within the corridor is consistent with the enabling legislation. However, in the spirit of cooperation, the Companies will offer both mitigation and enhancement, in proportion to the area disturbed, if the BLM Preferred Alternatives are selected and approved in a ROD.

4.0 IMPACT OF THE PROJECT ON BOPNCA

This section largely summarizes the results of the Final EIS analysis, with the exception of the Final EIS assertions regarding the relationship of predator and prey populations. The section presents first the impacts of the Proposed Routes (i.e., the RAC-subcommittee-recommended routes), then the impacts of the BLM Preferred Routes (i.e., Proposed 8 as modified by Alternative 8B and Proposed 9 as modified by Alternative 9E).

This summary focuses on those resources emphasized in the enabling legislation. Enabling legislation for the BOPNCA, while focusing on the conservation, protection and enhancement of raptor populations and habitats and the natural and environmental resources and values associated therewith, also mentions important historic and cultural resources (including significant archaeological resources) that should be protected and appropriately managed.

The two tables below show the disturbance impacts of the Companies' Proposed Routes and the BLM Preferred Routes. The Companies have focused the discussion on these routes because other routes have substantial disadvantages. Table 5, below, shows the total estimated disturbance from construction, including all those areas that will be reclaimed as part of the Project-wide mitigation plan, while Table 6, below, shows the total estimated long-term site occupancy from permanent facilities associated with the Project, including the transmission towers and their permanent access roads. Totals may appear off by up to an acre due to rounding.

Table 5 Acres of Construction-Related Project Disturbance within BOPNCA on BLM-Managed Lands

Segment	Route	Acres of Disturbance from Construction of Project within BOPNCA (Federal lands)		
		Natural Vegetation	Disturbed Vegetation1/	Total
8	BLM Preferred	38	49	87
	Proposed	20	300	321
9	BLM Preferred	76	188	264
	Proposed	116	830	947
Combined	BLM Preferred	114	237	351
	Proposed	137	1,131	1,267

1/ The "disturbed vegetation" class includes areas with roads, cheat grass invasion, and other disturbances to the naturally occurring vegetation in the area prior to construction.

Table 6. Acres of Operation-Related Disturbances within BOPNCA on BLM-Managed Lands

Segment	Route	Acres Occupied during Operation of Project within BOPNCA (Federal lands)		
		Natural Vegetation	Disturbed Vegetation1/	Total
8	BLM Preferred	3	5	8
	Proposed	2	27	28
9	BLM Preferred	7	21	28
	Proposed	14	56	69
Combined	BLM Preferred	10	26	36
	Proposed	15	82	97

1/ The "disturbed vegetation" class includes areas with roads, cheat grass invasion, and other disturbances to the naturally occurring vegetation in the area prior to construction.

4.1 Cultural Resources

The Proposed Route for Segment 8 would avoid the utility avoidance/restricted area around a National Register Historic District within the BOPNCA. The crossing of the Snake River would likely encounter some cultural issues because the site density near the river is higher for both prehistoric and historic resources. Some direct effects on archaeological sites may need to be addressed through avoidance micrositing with the Segment 8 Proposed Route, but indirect effects can be minimized by paralleling closely the existing line. The Preferred Route for Segment 8 avoids the District.

Previous surveys in the area of Segment 9 have been limited, which may account for the low known site density, but they have demonstrated that the area was a center for cultural interactions, suggesting that actual site density may be moderate to high. The Proposed Route would cross a National Register Historic District and parallel NHTs through the BOPNCA. The Proposed Route crosses 9 NHT segments, while the Preferred Route for Segment 9 does not cross any NHT segments.

The BOPNCA RMP emphasizes managing areas along the Oregon NHT as VRM Class II, to provide reasonable protection for the NHT. The Segment 9 Proposed Route is not consistent with these VRM requirements and would require an amendment to the land use plan reclassifying specified areas affected by the transmission line to VRM Class III. Reclassification areas would require micrositing to ensure a one-half mile buffer from NHTs and to minimize visual impacts to the cultural resources.

The Programmatic Agreement for this project provides for the development, review, and approval by BLM and the Idaho SHPO of a Historic Properties Treatment Plan (HPTP) for unavoidable adverse effects to historic properties eligible for listing, or listed on, the National Register of Historic Places. Once a route is selected for Segment 8 and for Segment 9, the Companies will develop an HPTP to fully mitigate for adverse effects on trails and other cultural sites and areas.

4.2 Vegetation Resources

4.2.1 General Vegetation

Segment 8 would cross very little wetland area and no forested areas within BOPNCA, regardless of route chosen. The vast majority of the vegetation is shrubland, most of it disturbed by previous human activities. The other two important vegetative types are grassland and agriculture in the Segment 8 area.

Similarly, both the Preferred and Proposed Routes for Segment 9 largely impact already-disturbed vegetation, including disturbed sagebrush and disturbed grasslands within the BOPNCA. See Tables 5 and 6, above, for estimates of disturbance acres for construction and for long-term site occupancy of transmission infrastructure for the BLM Preferred and the Companies' Proposed Routes.

Ecological site potential is an approach developed by the Natural Resources Conservation Service (NRCS) for classifying ecological sites on the basis of soil and climate characteristics, then further classifying them based on vegetation (NRCS 2014d). The NRCS proposes a model to identify the "state" of an ecological site, where State 1 is the reference "natural" or "pre-settlement" vegetation type for that ecological site. Other States are identified based on whether

it is likely that the vegetation observed can once again achieve State 1 (typically identified as States 1.2, 1.3, etc.) or whether conditions have changed so much that a "threshold" has been crossed (State 2). If a threshold has been crossed such that the site is very unlikely to be able to achieve any version of State 1, then NRCS recommends identifying a State 3 as the mitigation goal, which is a practical estimate of what vegetation the degraded or altered site, in its State 2, can reasonably be expected to support. The Companies support this approach and recommend the following:

> "Baseline" should continue to be defined as the current conditions on the ground. It should be further quantified with a field survey for the route selected by the BLM for approval. The field survey should include vegetation sampling and the more qualitative Rangeland Health assessment, that will encompass adjacent land to the proposed restoration site and evaluate the ability of mitigation activities to be successful in the larger context of its surrounding landscape.

Instead of proposing the "return" of the site to baseline conditions, the Companies propose that a reasonable mitigation goal be assigned to each ecological site crossed by the Project based on its baseline condition. For much of the BOPNCA, where past land uses have degraded many ecological sites to a State 2 condition, that mitigation goal will be a reasonably achievable State 3. Where past land uses have not seriously degraded an ecological site and it is currently in a variation of State 1, a reasonably achievable goal might be another variation of State 1. Thus, the objective of compensatory mitigation could be revised to read, "The compensatory mitigation program addresses the "residual effects" which persist after standard mitigation has been implemented. This additional mitigation is required to move the impacted area to a reasonably achievable mitigation goal vegetation type, specific for each ecological site impacted."

The BLM has encouraged the Companies to use the NRCS Ecological Site Potential approach to determining the potential for reclamation and restoration within BOPNCA. Table 7 shows the ecological sites mapped for Proposed Segment 8 and Segment 9 in the BOPNCA. It also shows that there are important portions (38% for Segment 8 and 12% for Segment 9) where data are not available. The Companies will work with the BLM to further develop these data.

Table 7. Ecological Sites Mapped for Proposed Segment 8 and Segment 9 in the BOPNCA

Segment	Ecological Site Name[1/]	Relative Proportion of the Route Occupied by Ecological Site	ESD Status[2/]
Segment 8	CHURNING CLAY 12-16 ARCA13/POA	0.5%	Final
	SANDY LOAM 8-12 ARTRW8/ACHY-HECOC8	2.2%	Draft
	CALCAREOUS LOAM 7-10 ATCO-PIDE4/ACHY-ACTH7	2.4%	Draft
	LOAMY 8-12 ARTRW8/PSSPS-ACTH7	11.6%	Final
	STONY 10-12 ARTRW8/PSSPS	16.0%	Draft
	CLAYPAN	29.4%	Final
	No Data	38.0%	NA
Segment 9	Non-vegetated land	0.2%	NA
	SHALLOW LOAMY 8-12 ARTRW8/PSSPS	0.2%	Final
	LOAMY 10-13 ARTRW8/PSSPS	0.3%	Final
	CHURNING CLAY 12-16 ARCA13/POA	0.3%	Final
	SALINE BOTTOM 8-12 SAVE4/LECI4	1.9%	Draft
	SILTY 7-10 KRLA2/ACHY	2.4%	Draft
	SAND 8-12 ARTRT/ACHY	3.3%	Draft
	No Data	12.1%	NA
	SANDY LOAM 8-12 ARTRW8/ACHY-HECOC8	17.7%	Draft
	LOAMY 8-12 ARTRW8/PSSPS-ACTH7	18.1%	Final
	CALCAREOUS LOAM 7-10 ATCO-PIDE4/ACHY-ACTH7	43.5%	Draft

1/ NRCS 2014c.
2/ NRCS 2014d and Sutter 2014.
3/ Ecological site description not available for soil map unit.

4.2.2 Invasive Plant Species

The establishment of invasive plant species can affect the quality of habitat through competition with, and eventual replacement of, desirable native species. Replacement of native species can have various environmental effects including changes in fire regime (increasing the frequency and severity of fires), changes in the nutrient regime of soils, and increased soil erosion. For example, cheatgrass (*Bromus tectorum*) can proliferate rapidly in disturbed arid and semi-arid sagebrush grasslands, and can increase the rate and severity of fires, thereby creating a cycle of disturbance that ultimately increases the rate of cheatgrass establishment and spread. This has occurred in many places within the BOPNCA and cheatgrass eradication and replacement with native vegetation is a major focus of the BOPNCA reclamation and restoration program.

To effectively implement measures for limiting the spread or introduction of invasive plant species, the Companies have prepared and submitted in the August 2013 POD detailed framework Reclamation and Noxious Weed Plans, whose measures will be implemented prior to, during, and after construction to limit the introduction or spread of invasive plant species due to construction and operation and maintenance activities.

4.2.3 Wetlands

Construction of the Proposed or the Preferred Route for Segment 8 would not affect wetland areas within the BOPNCA.

Approximately 0.2 acre of wetlands and riparian areas would be affected by construction of the Preferred Route of Segment 9 within the BOPNCA. Approximately 1.1 acres of wetlands and riparian areas would be affected by construction of the Proposed Route within the BOPNCA.

During detailed design for the Project, once a route has been approved, the Companies' engineers will work to avoid impacts to wetlands and to minimize impacts to riparian areas both inside and outside the BOPNCA. Unavoidable impacts to wetlands and riparian areas will be subject to full compensatory mitigation requirements of the U.S. Army Corps of Engineers 404 permit process.

4.2.4 Special Status Plant Species

Slickspot peppergrass (*Lepidium papilliferum*) was listed as threatened under the ESA on October 8, 2009 (74 *Federal Register* 52014). On August 8, 2012, the Idaho District Court vacated and remanded the USFWS decision to list slickspot peppergrass. For the purposes of the Final EIS, the BLM decided to continue to conference with the USFWS and will treat slickspot peppergrass as a species proposed for listing and manage the habitat as such. Since the Final EIS was published, the USFWS reopened the comment period on both the proposed listing as Threatened and on the designation of Critical Habitat. Those comment periods closed June 5, 2014, and the USFWS is preparing a final rule for the listing and the critical habitat. The Companies anticipate that the BLM will continue to conference with the USFWS on this species in anticipation of its re-listing and of the listing of critical habitat. In the interim, the Companies assume the BLM will treat the proposed listing of critical habitat as if it were final and will continue to account for impacts to potential habitat.

This species occurs in semi-arid, sagebrush-steppe habitats of the Snake River Plain and adjacent foothills in southwestern Idaho and the Owyhee Plateau in south-central Idaho. It occurs only in slickspot microsites, which have soils much higher in clay content and significantly higher in sodium than adjacent areas.

Table 8, below, shows the potential impacts to slickspot peppergrass proposed critical habitat and potential habitat for the BLM Preferred and the Companies' Proposed Routes within the BOPNCA.

Table 8. Estimated Construction Impact (acres) on Proposed Critical and Potential Habitat for Slickspot Peppergrass on Federal Lands, BOPNCA

Segment	Route	Acres of LEPA Habitat Types, BLM and BOR Lands, BOPNCA	
		Proposed Critical Habitat	Potential Habitat
8	BLM Preferred	26	0
	Proposed	8	58
9	BLM Preferred	0	20
	Proposed	0	0
Combined	BLM Preferred	26	20
	Proposed 8 & 9	8	58

The BOPNCA RMP requires that "surface disturbing activities be located at least ½ mile from occupied sensitive plant habitat." The RMP also requires the implementation of certain conservation measures in slickspot peppergrass habitat. Therefore, an amendment to the RMP would be required for the Segment 8 Proposed Route to be in conformance with the RMP.

In the Biological Assessment, Appendix M of the Final EIS, the BLM stated that Project activities "may affect slickspot peppergrass and slickspot peppergrass habitat" and that "therefore, the BLM determined that the Project may affect, and is likely to adversely affect, slickspot peppergrass." The BLM goes on to state that "proposed critical habitat would be crossed by the ROW of Segment 8" and that the "Project may affect, and is likely to adversely affect, proposed critical habitat for slickspot peppergrass." For Alternatives 8D, 8E, 9G, and the Preferred Routes for Segment 9, they concluded that the Project will have no effect on slickspot peppergrass. The Final EIS also concluded there would be no effect on any other sensitive plant species. The Companies expect that the Supplemental EIS will conduct a similar analysis of the RAC-recommended routes and come to a similar conclusion.

Although the BLM concluded that the Project may affect slickspot peppergrass as the portions of the Project may cross slickspot peppergrass habitat, the Project will implement routing and siting measures and environmental protection measures to minimize impacts to and largely avoid slickspots. The U.S. Fish and Wildlife Service (USFWS) stated in the Biological Opinion and Conference Opinion, that the "proposed action is not likely to jeopardize the continued existence of slickspot peppergrass." The Companies expect that further conferencing with the USFWS regarding the RAC-recommended routes will come to a similar conclusion.

4.3 Wildlife Resources

4.3.1 General Wildlife

The dominant habitat type along the Proposed Route of Segment 8 and Segment 9 within BOPNCA is disturbed grassland, followed by disturbed shrubland. These habitats support small mammals, birds, big game, and many other species. These habitats, already fragmented with existing roads and transmission lines, would be further fragmented with the construction and operation of an additional line.

4.3.2 Raptor Impacts

The Final EIS states, "The five raptor species that are the most common in the Analysis Area have specific habitat requirements and nesting habits. Ferruginous hawk, prairie falcon, golden eagle, and burrowing owl are open-country birds, living in grasslands and shrublands. Ferruginous hawks build their nests on the ground, hillsides, rock outcrops, creek banks, buttes, bluffs, sagebrush, and human made structures in unforested areas with good visibility. Prairie falcon and golden eagle nest most commonly on cliffs or bluffs, but also in trees, manmade structures, or other sites. Burrowing owls are closely associated with prairie dogs or other burrowing animals, as they re-use existing burrows for their nest sites. Red-tailed hawks also prefer open to semi-open habitats such as sagebrush shrublands, and in Wyoming are often found nesting in cottonwoods (*Populus* spp.; Preston and Beane 2009). The Forest Service and BLM, based on the best available science, are using one-mile buffers around the nests of all raptor species to minimize direct and indirect effects. The [FEIS] Proposed Route for Segment 8 lies within 1 mile of the highest number of raptor nests, 307, of any of the segments. This segment runs through the SRBOP, home to the largest concentration of nesting raptors in North America.[1]"

1 Final EIS, Section 3.10, Page 3.10-18

The Companies anticipate that the BLM will conduct a similar analysis for the RAC-recommended routes. Using the same data set as for the Final EIS, the Companies conducted a preliminary analysis that shows that the presently Proposed Segment 8 is within a mile of 178 raptor nests while Proposed Segment 9 is within a mile of 608 raptor nests, 541 of which are on federally managed lands. The question remains whether such proximity is an adverse effect. The Companies believe there is considerable evidence in the literature that shows no adverse effect on raptors from transmission lines.

As stated in correspondence to the BLM on August 8, 2012, Karen Steenhof, raptor biologist, wrote:

"In 1981, less than a year after Secretary of the Interior Cecil Andrus withdrew 482,000 acres of public land to protect birds of prey nesting in the Snake River Canyon in southwestern Idaho, Pacific Power and Light Company (PP&L: now PacifiCorp) began construction of a 500-kV transmission line across what is now the Morley Nelson Snake River Birds of Prey National Conservation Area. Raptor Expert Morley Nelson assisted PP&L with routing the line so it would not adversely affect raptors and with designing platforms for transmission towers that would encourage raptor nesting (Nelson and Nelson 1976, Nelson 1982).

From 1981 through 1989, Bureau of Land Management (BLM) and PP&L biologists monitored the response of raptors and ravens to the transmission line (Engel et al. 1992, Steenhof et al. 1993). They found that the 500-kV transmission line enhanced opportunities for raptor perching, nesting, and roosting. Unlike smaller distribution lines, large transmission lines do not present an electrocution hazard for large birds because the wires are too far apart for raptor wings to contact more than one wire at a time. Collision with transmission lines does not appear to be an issue for birds of prey in desert environments.

Raptors and ravens were attracted to the 500-kV line, and productivity of hawks and eagles nesting on transmission towers was as good as and sometimes better than that of those nesting in the canyon. In some cases, transmission line towers provided more secure nesting substrate than natural nesting sites. By 1989, 8 pairs of Golden Eagles, 11 pairs of Ferruginous Hawks, 33 pairs of Red-tailed Hawks, and 81 pairs of ravens were nesting on the transmission line between Midpoint, Idaho and Summer Lake, Oregon (Steenhof et al. 1993). In addition, biologists documented 13 communal night roosts of Common Ravens on the transmission line, including one roost on transmission line towers within the MNSRBOPNCA with more than 2100 ravens, one of the largest raven communal roosts ever documented in the world (Engel et al. 1992). Ravens used the roosts from spring to autumn, and as many as 700 roosted on a single tower."

It is clear from the existing literature and observations within the BOPNCA that transmission lines do not adversely affect and apparently enhance the raptor and raven populations. The Final EIS asserts that the enhancement of raptor and raven populations could have an adverse effect on small mammal populations and therefore reduce raptor and raven populations:

"If the Project's transmission line and structures becomes an attractant to raptor and raven, and their numbers increase along the Project, this factor coupled with the reduced shrub cover in areas recovering from construction disturbances (i.e., a reduction in hiding cover for small animals) could result in increased predation rates on prey species, including small mammals. The primary mammalian prey species for diurnal predatory birds in the Project area include, but are not limited to, ground squirrel, black-tailed jackrabbits, cottontails, while many nocturnal raptor

species take voles, mice, and rats (Snake River Birds of Prey RMP 2008). Increase (sic) predation rate on prey has the potential to subsequently impact raptor populations. For example, the population size and health of golden eagles in SRBOP has been linked to the population size of jackrabbits (Steenhof et al. 1997; Snake River Birds of Prey RMP 2008); as a result, increase predation rates on jackrabbits in SRBOP has the potential to impact the population size and health of golden eagles in SRBOP.[2]

The Companies do not find this assertion consistent with the best available science. There is no convincing information in the literature that predators are limiting (small) mammal prey populations (Korpimäki and Krebs 1996, Krebs 2002); there is even less evidence that this is the case with avian predators (Newton 1993, 1998). Thus, the statement that an influx of avian predators using the new transmission structures for hunting perches to procure prey is unfounded. Steenhof et al. (1993) documented that common ravens (*Corvus corax*) and red-tailed hawks (*Buteo jamaicensis*) were the 2 most common nesting birds (i.e., 114 out of 134 total nests) using towers along a 350-mi newly built transmission line (0.4 nest/mi). It is unlikely that this relative small number of nesting birds would have any impact on their prey base along the 350 mile line. Also, common ravens roosted in large numbers on transmission towers of this line (Engel et al. 1992). However, ravens were already roosting in the general area where the transmission line was built (Engel et al. 1992) and shifted their roost to a safer location. Large raven roosts were likely the result of locally abundant food sources associated with agriculture that is present year-round (Engel et al. 1992). Thus, there was not an influx in the area due to the building of the transmission line as suggested by the BLM, rather there was a redistribution of the existing population. Roosting ravens dispersed in the morning to feed at feed-lots and other agriculture associated enterprises (Engel et al. 1992). There was no evidence that these birds used the transmission towers to exploit small mammal populations.

The BLM also states that increased predation of prey may impact specialized predators, such as golden eagles, because of over exploitation of the prey afforded by more perching opportunities with the new line. Extensive research has been conducted by the BLM in the BOPNCA since the early 1970s on birds of prey. Golden eagles (*Aquila chrysaetos*), prairie falcons (*Falco mexicanus*), and red-tailed hawks (*Buteo jamaicensis*) are 3 of the most extensively studied birds of prey species in relation to their prey (Kochert et al. 1999; Marzluff et al. 1997; Steenhof and Kochert 1988, Steenhof et al. 1997, 1999) in the BOPNCA. Steenhof et al. (1997) showed that jackrabbit abundance influenced eagle production (number of young fledged per pair) during about 2/3 of the 23 years study. Prairie falcon reproductive rates are closely tied to ground squirrel relative abundance (Steenhof et al. 1999, USDI 1996). Ground squirrel abundance is related to climatic fluctuations over time (Van Horne et al. 1997, 1998). Thus, there is no evidence that even specialized avian predators are limiting their principal prey populations in the BOPNCA. In fact, it is the reverse; prey populations limit avian predator populations. Therefore, BLM's statement that building of a new transmission line would cause an influx of avian predators that would deplete small mammal populations which, in turn, would affect nesting avian predators has no factual basis and is not supported by fundamental research on prey-predator populations conducted by the BLM in the BOPNCA.

[2] Final EIS, Section 3.10, Page 3.10-29

The Companies maintain that there is no evidence that constructing and operating the Proposed Routes for Segments 8 and 9 will have an adverse effect on the resources and values for which the enabling legislation designated the BOPNCA. In particular, construction and operation of these two segments will not have any long-term adverse impact on raptors and ravens or on their prey or the prey's habitat.

5.0 PROPOSED COMPENSATORY MITIGATION AND ENHANCEMENT APPROACH

As previously referenced, the November 14, 2013 ROD for the Project states,

"The Proponents' proposal, including environmental protection measures, and BLM standards and requirements for surface-disturbing activities for routes in the NCA would conserve and protect NCA resources."

Also as stated in Section 4.3.2, there is no adverse effect on raptors or their prey species due to the lattice structures, rather these structures provide additional nesting, perching, and roosting substrates. The Project would have no adverse impacts on the values for which BOPNCA was designated and may enhance the BOPNCA in important ways. However in the interest of receiving a ROW grant for both Segments 8 and 9, the Companies have proposed this Draft MEP, which includes additional compensatory mitigation to fully offset all impacts to habitat in the BOPNCA from the long-term presence of the Project back to "baseline." It also provides enhancement to raise the value of the BOPNCA above that baseline to further advance the protection and enhancement of the objects and values of the BOPNCA.

The Companies recognize that although access roads within the BOPNCA provide benefits, they may also increase public access and thereby may increase the risk of vandalism, weed infestation, litter, etc. This potential increase in risk is accounted for in the MEP. The Companies further acknowledge that BLM standards for mitigation within the NCA require offset of impacts "back to baseline." The Companies, in consultation with the BLM, assume that "baseline" is the affected environment as presented in the Final EIS. This has been described in Section 4.0, above.

The Companies' MEP considers the following key elements:

1. Robust Project-wide avoidance, minimization, restoration, and compensatory mitigation measures
2. Additional mitigation proposed herein;
3. Mitigation and enhancement ratios;
4. Effectiveness of restoration projects within the BOPNCA (i.e., recognizes monetarily that restoration projects are not 100% effective);
5. Lag time required for restoration to be fully successful;
6. Long-term maintenance and monitoring;
7. Protection of important cultural sites through property purchase;
8. Long-term law enforcement emphasis to change inappropriate public misuse of the BOPNCA, which in turn enhances the lawful visitor experience; and
9. Enhancement of the visitor experience through education, research, and public outreach.

5.1 Avoidance and Minimization through Routing and Environmental Protection Measures

The POD prepared to support the ROD, submitted August 2013, fully incorporated all the Environmental Protection Measures (EPMs) specified in the Final EIS and provided substantial additional detail in Environmental Protection Plans. By submitting the August 2013 POD the Companies explicitly incorporated the EPMs and Plans as part of the Project design and Best Management Practices (BMPs). See Appendix A for a list of the EPMs and Plans that apply to the BOPNCA.

The routes analyzed in the Final EIS represented several years of cooperative work with the BLM and other agencies (see Section 3.4 for siting history). From the initial siting and routing efforts through work with the Boise RAC subcommittee in 2013 and 2014, the Companies have made every effort to avoid sensitive areas where feasible. Where complete avoidance was not feasible, the Companies have incorporated many EPMs that minimize impacts, including limited operating seasons.

5.2 Reclamation and Project-Wide Compensatory Mitigation

In addition to the avoidance and minimization measures that are part of the Project design and description, the Companies also committed to Project-wide reclamation for construction-related disturbances. Please see the following plans, submitted as part of the August 2013 POD and made a part of the ROD, for additional details on commitments to reclamation:

- Environmental Compliance Management Plan
- Reclamation Plan
- Noxious Weed Plan
- Stormwater Pollution Prevention Plan

Recognizing that there will be residual impacts on important resources even after avoidance, minimization, and reclamation measures are in place, the companies have prepared and submitted a revised package of compensatory mitigation plans that cover impacts to sage-grouse habitat, to forested migratory bird habitat, waters of the U.S., and historic trails. Appendix A contains a table demonstrating the applicability of the various EPMs to the BOPNCA and a table showing the applicability of the plans to the BOPNCA.

The Final EIS does not show sage-grouse habitat, forested habitat for migratory birds, or substantial wetlands within the BOPNCA. Therefore, the compensatory mitigation plans designed for sensitive habitats Project-wide largely do not apply to the BOPNCA.

Impacts to historic trails will be fully compensated through the trails mitigation plan, currently in draft, that will be finalized in consultation with the BLM and the Idaho SHPO for trails impacts in Idaho, including but not limited to, those within the BOPNCA. As specified in the Programmatic Agreement, site-specific Segment Plans will be developed, reviewed, and approved as appendices to the Project-wide Historic Properties Treatment Plan as historic properties that cannot be avoided are identified and appropriate treatments proposed and accepted.

In conclusion, the Companies have committed to extraordinary measures to avoid and minimize impacts, reclaim areas after construction, and provide for third party monitoring and reporting to assure measures are applied. Beyond those measures, the Companies have committed to provide substantial funding in Project-wide compensatory mitigation.

The Companies recognize that the NLCS administration asserts that, in order to allow the Project to cross the BOPNCA, additional mitigation and enhancement measures are necessary, even above and beyond those now part of the Project Description as explained above. Section 5.3 discusses the concept of additional mitigation, while Section 5.4 discusses enhancement of the values for which the BOPNCA was established.

5.3 Restoration and BOPNCA Mitigation Goals

In consultation with the BLM, the Companies offer a compensatory mitigation proposal to bring the BOPNCA to "baseline" based on the long-term operational footprint. The Companies understand that although BLM does not require additional compensatory mitigation for the existence of transmission infrastructure on public lands generally, that the NLCS policy is to require additional compensatory mitigation because the baseline before the transmission line is built included the area to be occupied by the tower pads and access roads. The footprint of long-term site occupancy by the Project infrastructure is shown in Table 6, above.

There has been substantial discussion regarding what constitutes "baseline," and more importantly, mitigation goals, for the various ecological sites crossed by the Project within the BOPNCA. The Companies believe that baseline is, and should continue to be, defined as the current condition of the vegetation. Mitigation goals should be based on a science-based likelihood of success, and the NRCS state and transition model methods provide that approach. The Companies are now, and have consistently been offering, a 1:1 ratio for the long-term footprint of the Project. The components of compensatory mitigation include funding for habitat restoration and law enforcement (refer to Section 6.1).

At a 1:1 ratio, for every acre of long-term occupancy, regardless of the disturbed or undisturbed nature of the baseline vegetation prior to construction, the Companies are proposing to fund one acre of off-site small-project restoration work within the BOPNCA, estimated $1,800 per acre. The Oversight Committee will be in charge of determining the desired future condition of that work, determining the kind of restoration needed, and monitoring for success. See Section 6 for details of the Portfolio.

New access roads within the BOPNCA may provide additional opportunities for inappropriate public use as well as for the more positive benefits of firebreaks and emergency access. In consultation with the BLM, the Companies therefore also offer funding for law enforcement to help compensate for the additional indirect effects of new roads. The Companies, based on information from BLM, estimate that a full-time equivalent (FTE), including salary, transportation, and overhead costs, to be approximately $140,000 annually. Since the new road will not require an entire FTE of law enforcement attention to change public behavior, the Companies propose to provide one quarter FTE of funding as mitigation for additional roads, or $35,000 annually, for 10 years. The reasoning for limiting the funding to 10 years is that focused law enforcement, including advertising, messaging, and patrol, should substantially reduce inappropriate behavior in 10 years.

For the routes the Companies have proposed within the BOPNCA, the total "footprint" includes 97 acres, while for the BLM-Preferred routes, there are 36 acres of long-term project occupancy. Restoration costs of $174,780 and law enforcement of $35,000 annually for 10 years brings the total offered for mitigation to $524,780 for the Companies' Proposed Routes for Segments 8 and 9. The Companies believe that this mitigation offer for the long-term presence of the transmission line fully compensates for the long-term presence of the transmission line and meets this requirement of the NLCS policy.

5.4 Enhancement Ratios

The Companies offer, in the spirit of cooperation and with the intent of fully supporting a BLM decision for Segment 8 and Segment 9 in 2014, the following enhancement ratios. These were used in the calculation of the necessary level of enhancement to offset the habitat disturbed by Project construction on lands managed by the BLM and for the enhancement of the resources and values for which the BOPNCA was designated.

National Energy Corridors were established that cross the BOPNCA, which the RMP acknowledges and memorializes as utility corridors in the RMP. Locating utilities within these corridors is consistent with the RMP and with the enabling legislation for the BOPNCA and therefore should require no additional enhancement to be consistent with the enabling legislation. One of the reasons the corridors were established in these locations was that they had minimum impact on the BOPNCA. Another was that they largely cross disturbed vegetation—sagebrush and grassland habitat invaded by cheatgrass, which in some cases has resulted due to fires.

The Companies propose to compensate for impacts using the following ratios against the construction disturbance footprint:

Within designated utility corridors on BLM-managed Public Lands:

- 1:1 ratio for impacts to presently undisturbed ecological sites within the BOPNCA; and
- 0.5:1 ratio for impacts to presently disturbed ecological sites within the BOPNCA.

Outside designated utility corridors on BLM-managed Public Lands:

- 2:1 ratio for impacts to presently undisturbed ecological sites within the BOPNCA; and
- 1:1 ratio for impacts to presently disturbed ecological sites within the BOPNCA.

The Companies believe it is important to recognize the baseline condition of the ecological sites crossed by the Project. Where those areas have already been degraded and have crossed a threshold that will make restoration to "climax" vegetation extremely unlikely, the ratios offered are less. Where the project will impact some of the relatively rare remaining undegraded vegetation, the risks of that vegetation being invaded from adjacent land uses by cheatgrass or other noxious weeds is higher, and the ratio of funding for off-site intensive restoration projects should be higher.

Temporary project impacts will be restored to previous conditions to the extent practicable and in accordance with the Project Reclamation Pan. The Companies acknowledge that reclamation will require several years before it is successful. In order to address the temporary loss of fully functional habitat while the reclaimed areas rejuvenate and mature, the Companies therefore offer the above enhancement ratios based on ***construction*** impacts on BLM-managed Public

Lands within the BOPNCA, which provides over ***ten times*** the enhancement acres over using the operational impact estimate. Using the construction footprint estimate thereby substantially increases the proposed enhancement within the MEP.

6.0 ENHANCEMENT PORTFOLIO PROPOSAL

This section is based on project types and estimated costs for the Proposed Routes for Segments 8 and 9. This basis is used because these routes cross through the BOPNCA for several miles and are likely to have the largest impact on the BOPNCA. Other routes, including the BLM preferred alternative as presented in the Final EIS, impact much less of the BOPNCA. The project types used within this Draft MEP to determine appropriate levels of funding for enhancement and to address the enabling legislation, for which the BOPNCA was established, include habitat restoration, law enforcement, visitor enhancement, property purchase, removal of existing power lines and associated facilities, and a management fund (refer to Section 6.1). The Companies propose to scale the habitat restoration, law enforcement, property purchase, and visitor enhancement components of this Draft MEP based on the acreage of construction impact on the BOPNCA of the routes approved. The Companies offer removal of portions of two Idaho Power existing lines within the BOPNCA regardless of alternative chosen. The Companies also offer management funding of $50,000 a year for 20 years, which is also a fixed amount regardless of alternatives for both Segments 8 and 9 selected. Please see Sections 6.1.5 and 6.3 for additional discussion.

The following discussion of project types and activities was developed using input from BLM staff, information from the Final EIS, the BOP RMP, enabling legislation, and NLCS manuals. The project types and mix were developed to demonstrate that enhancement could be accomplished and would be of sufficient quality and quantity to allow routes through the BOPNCA and to identify the maximum financial contribution from the Companies. One of the key features of the MEP is the development of an Oversight Committee (Section 6.2.2). The Oversight Committee would be responsible for reviewing proposed projects and addressing the following:

- Funded projects are consistent with the projects described below; however, project types and mix can change from those described below (agreed upon funding will be made available based on the ratios, estimated costs, and acres of construction impact, not upon the type and/or mix of projects finally selected by the committee).
- Methods, success criteria, monitoring, etc. are sufficiently detailed prior to funding any habitat restoration project and are appropriate for the conditions in the BOP. The Oversight Committee may include adaptive management as part of a habitat restoration project.
- Habitat restoration projects take advantage of natural and man-made fire breaks or incorporate newly-created fire breaks where practicable.
- Habitat restoration projects may incorporate research, but the primary purpose of the project is to restore habitat to support raptor prey species.
- Coordination with current and future BLM-funded and implemented projects within the BOPNCA will occur to maximize funding and project extent.

6.1 Project Types

Based on discussions with the BOPNCA Manager and other BLM staff, the Companies propose the following general outline, approaches and proposed project mix, regardless of route:

1. Habitat restoration (60% or more)
2. Purchase of high-priority private inholding (approximately 104 acres)
3. Law Enforcement
4. Visitor Enhancement (approximately 10%)
5. Removal of an existing line and substation

Note that these project types were selected to allow for an estimate of the total fund value, not to restrict the BLM or the Oversight Committee in the use of the funds to just these project types or in this proportion. The Companies expect that the Oversight Committee will be given the opportunity to determine the best project mix at the time of implementation, and to manage adaptively based on the success of early projects.

Costs are estimated based on information provided by the BLM, in the cases of habitat restoration, law enforcement, and visitor enhancement. The case of the property purchase was determined by recent market transactions. These costs and this level of enhancement were based on the estimated amount of disturbance, both temporary and permanent, caused by the Project as proposed. They are also based on the ratios of disturbance acres to enhancement acres provided in Section 5.4. Additional details on how the fund would be financed and managed are found in Section 6.2, below. Appendix B provides details on the calculations based on the disturbance "footprint" of construction and operation. Though Appendix B now addresses only the BLM Preferred and the Companies' Proposed Routes, the impacts of other routes could also be calculated and fund values estimated if needed.

6.1.1 Habitat Restoration

6.1.1.1 Proposal

There are many opportunities for habitat restoration in the BOPNCA. Two of the most important restoration activities are the conversion of non-native grasslands to native perennial plant communities and noxious weed control. These restoration projects target the enhancement of habitat for prey species for raptors.

As detailed in the RMP, grazing is permitted within the BOPNCA but the livestock often have adverse impacts to riparian areas. Projects that work with grazing permittees to fence spring and immediate contributing areas from livestock and to develop alternate, off-site watering facilities for livestock would also substantially contribute to restoration and enhancement of riparian areas.

6.1.1.2 Cost Estimate

The BLM's estimated average cost of habitat restoration within the BOPNCA through utilizing smaller-scale intensive treatments is $1,500 per acre. Through discussion with the BOPNCA manager and based on the Companies' experience, the average success rate of such projects is approximately 80 percent. In order to address the risk of project failure and the need to conduct additional measures, the Companies will provide additional compensatory mitigation of $300 per acre totaling $1,800 per acre for habitat restoration, which accounts financially for the 20 percent failure rate. Based on preliminary estimates of the construction footprint for the Proposed Routes for Segments 8 and 9, the total for direct funding of habitat restoration is estimated at $2,526,660.

6.1.1.3 Effectiveness

The proposed habitat restoration techniques have been implemented over the last several years in the BOPNCA. Based on the success of these intensive restoration techniques, the Companies assume that these techniques are effective in restoring natural vegetation. However, the Companies realize that the success rate of these projects is not 100 percent. Through discussion with the BOPNCA manager and based on the Companies experience, the average success rate of such projects is approximately 80 percent. The Companies have taken this explicitly into account in estimating the overall cost per acre. Thus the Companies' estimated cost assumes that full effectiveness in transforming areas with invasive species such as cheat-grass to native vegetation can be achieved over time with a need to repeat treatments on 20 percent of the acreage.

The BOPNCA RMP, Section 2.3 (page 2-3) states "The greatest benefit to raptors is the stabilization of raptor prey populations, most notably the Piute ground squirrel. To stabilize and increase the small mammal prey base, remnant upland native shrub habitat must be preserved, inter-connected, and expanded. Restoring degraded areas to shrub/bunchgrass habitat with a forb component and biological soil crust provides additional habitat for small mammals, invertebrates, lizards, snakes, and birds." In accordance with the RMP, habitat restoration projects should be located in areas where it is most beneficial to raptor prey populations, rather than focusing on currently burned areas and seed / plant mixes should include shrubs that are suitable for small mammals. Therefore, appropriately focused habitat restoration projects will assist with the stabilization of raptor prey populations thereby benefiting raptors long-term.

6.1.2 Property Purchase

6.1.2.1 Proposal

The majority of the significant cultural resources within the BOPNCA are found in the canyon itself and are largely historic and precontact-era Native American archaeological sites, with some additional historic sites, including a historic bridge.

While important resources have been identified on BLM lands, many more are likely located on private land, given the landforms and proximity to the river of private lands within the canyon. These sites could be much better documented and preserved under BLM management. According to BLM staff, there are one or more parcels, surrounded by BLM lands, with substantial cultural and natural resource values within the canyon. Once purchased and deeded to the United States, this land could be managed together with adjacent BLM lands and would not require additional funding for separate management.

While the Project will not have a direct effect on the Guffey Butte–Black Butte Archaeological District, the Proposed Routes included herein may have other impacts on cultural resources within the BOPNCA. Therefore, the Companies propose to provide funding for the purchase, transaction fees, and ownership transfer of lands to the BLM for management in perpetuity as one element of this MEP.

6.1.2.2 Cost Estimate

The estimated cost of purchasing this land is unknown but is estimated at no more than $3,000 per acre, including transaction fees. Alternatively, the BLM could pursue conservation easements on one or more parcels at a lesser price per acre. The Companies therefore propose to

offer $320,000 to the BLM to complete the purchase of one or more important parcels, the actual application of which would be determined by the Oversight Committee, if the Proposed Routes are approved.

6.1.2.3 Effectiveness

The staff of the BOPNCA has identified private parcels, inholdings within the NCA, that likely contain important cultural resources as well as important habitat for raptors and their prey species. The Companies assume that moving these parcels into BLM management, when coupled with other mitigation and enhancement projects, will protect the existing cultural resources and will protect and ultimately enhance the habitat values of those lands. Because the Companies defer to an Oversight Committee on the selection of the parcels and the determination of fee or conservation easement purchases, a more complete estimate of effectiveness cannot be made.

The BOPNCA RMP, Section 2.2 (page 2-2) states "Acquire lands that contain significant natural or cultural resources as opportunities arise." Furthermore, the RMP, in Section 2.11 (page 2-15) states "As opportunities arise, acquire scattered State and private lands within the NCA to improve management." This measure will help the BLM meet these management actions as well as others identified in the RMP. Conservation of such lands will not only conserve and protect cultural resources but will also conserve and protect any habitat therein used by birds of prey and their prey base.

6.1.3 Law Enforcement

6.1.3.1 Proposal

In conversation with the BLM, law enforcement, particularly with regards to inappropriate public use, is a critical part of successfully managing the BOPNCA. The Companies recognize the importance of longer-term funding for law enforcement, since changing public perception and behavior can take years of focused efforts, including increased patrols, public service messages using various media, school-based education programs, etc.

6.1.3.2 Cost Estimate

Based on an estimate provided by staff of the BOPNCA, the Companies assume that a fully equipped law enforcement officer costs the BLM $140,000 annually per full-time equivalent (FTE), which includes costs for training, equipment, weapons, vehicle, etc. The Companies have already offered ¼ FTE of law enforcement ($35,000 annually) for 10 years to compensate for indirect effects of additional roads for their modified Proposed Routes (mitigation). In addition, as part of the MEP, the Companies are offering ¾ FTE for the first 10 years ($105,000 annually) and ½ FTE for the following 10 years ($70,000 annually) or $1,750,000 over 20 years as part of the MEP for the Proposed Routes.

6.1.3.3 Effectiveness

BOPNCA staff have provided evidence that focused law enforcement efforts can change the behavior of visitors even in the absence of law enforcement personnel. The Companies assume that a similar focus in law enforcement to change behavior, not just to punish inappropriate behavior, when coupled with signage and education programs, can be highly effective in reducing illegal activities like dumping and explosive target shooting within the BOPNCA.

Therefore it is reasonable to assume that a long-term investment in public education as carried out by a focused law enforcement effort (between mitigation and enhancement proposals, a full FTE over 10 years, then half an FTE over an additional 10 years) would be highly effective, not only in preventing the increase in illegal behavior perhaps encouraged by the presence of new roads associated with the Project, but also in permanently reducing illegal behavior in the BOPNCA, thereby further protecting the objects and values for which the NCA was established.

6.1.4 Visitor Enhancement

6.1.4.1 Proposal

Through discussion with Patricia Roller, informing and educating the public regarding the natural resources and values of the BOPNCA and enforcing the management rules would further enhance the objects and values of the BOPNCA and the public experience.

There are many opportunities for enhancement of visitor experiences within the BOPNCA. For example, the funding could be used to assist with funding of the "Raptor Camp," which provides opportunity for the public and local youth to learn of the values of and natural resources within the BOPNCA, including cultural significance of the area. Another possible use of funds would be to further educate the public and promote responsible use of the BOPNCA through the development of public service announcements and educational materials specifically addressing law enforcement issues, such as discouraging the use of exploding targets, in order to raise public awareness. Other uses include cultural resource education and outreach, visitor education materials such as displays, videos, and brochures, and funding for other ongoing visitor programs. The Companies encourage the Oversight Committee to consider educational programs focused on youth in the area and explore opportunities of long-term education and outreach with the community to continue to involve the community with the management and conservation of the BOPNCA. The Oversight Committee would be responsible for a selection of projects.

6.1.4.2 Cost Estimate

Support for this element is estimated at $50,000 per year for 10 years, for a total of $500,000 if the Companies' Proposed Routes are approved.

6.1.4.3 Effectiveness

Based on the experience of the BOPNCA staff, visitor enhancement programs that focus on youth and those that model and encourage appropriate use of the NCA have been effective in reducing inappropriate behavior and in educating the next generation in appreciation of the unique values of the NCA.

6.1.5 Line and Substation Removal

6.1.5.1 Proposal

Swan Falls to Bowmont

Idaho Power Company (Idaho Power) has identified a portion of an existing transmission line within the BOPNCA that can be removed. The existing Swan Falls to Bowmont transmission line is a 46-kV line that is authorized by BLM ROW grant I-16259. The line occurs within a 40-foot-wide ROW and crosses approximately10.8 miles of public lands managed by the BLM (Figure 3). Idaho Power would remove approximately seven miles of line on BLM-managed

lands, including all structures (although structures may remain if requested by BLM), from the Bowmont Substation to Gage Substation. Idaho Power would continue to use the existing line from the Gage Substation to Ferry Substation to serve its customers. Idaho Power will construct an approximately 1-mile-long section to connect the remaining portion of the line to the Idaho Power system. It is expected that the new construction will occur on private land. In addition, approximately 3.9 miles of existing 12.5 kilovolt lines, including 0.25 mile on BLM lands, will be re-constructed. Further, approximately 4 miles of the existing 46-kV line on existing BLM ROW between the Gage and Ferry substations would need to be converted to a 12.5-kV distribution line. This will require a neutral conductor to be strung on the existing structures and may require structure replacements. Idaho Power is also proposing to remove the existing Gage Substation and associated equipment/apparatus. The Gage substation is on BLM managed land.

Mountain Home to Bennet

Idaho Power Company has identified a portion of an existing transmission / distribution line within the BOPNCA that can be removed. The existing Mountain Home to Bennett transmission line (Line 210) is a 69-kV line with distribution underbuild (Figure 4). The 5.6 miles of the line on the BOPNCA without any distribution underbuild would be removed including all structures (although structures may remain if requested by the BLM). Idaho Power will continue to use the remaining portion of the line to serve customers. Idaho Power will also reconstruct approximately 2.2 miles of the existing feeder connection for the Saylor Creek (Glenns Ferry), all of which is on private lands. Idaho Power will conduct maintenance on the remaining portion of the line; this would be determined as part of the engineering analysis to support the removal.

6.1.5.2 Cost Estimate

The cost to the Companies to implement the removal and reconnection activities as described, is currently estimated at $1,922,000 for both the Swan Falls to Bowmont and the Mountain Home to Bennet lines.

6.1.5.3 Effectiveness

Removal of these portions of line would decrease the current disturbance footprint within the BOPNCA and address two concerns that have been raised regarding the Project and resources in the BOPNCA; removal of existing infrastructure to enhance raptor habitat and protection of slickspot peppergrass and its habitat. As shown on Figure 3, the northern portion of the line on BLM-managed lands crosses through identified slickspot peppergrass element occurrences and a BLM management area. Removal of the line and structures would negate the need for operations and maintenance in the area and eliminate potential impacts to slickspot peppergrass from Idaho Power activities. Idaho Power would rehabilitate disturbed areas following removal of the section of line and maintenance on the remaining portion of the line in accordance with the Project Reclamation Plan.

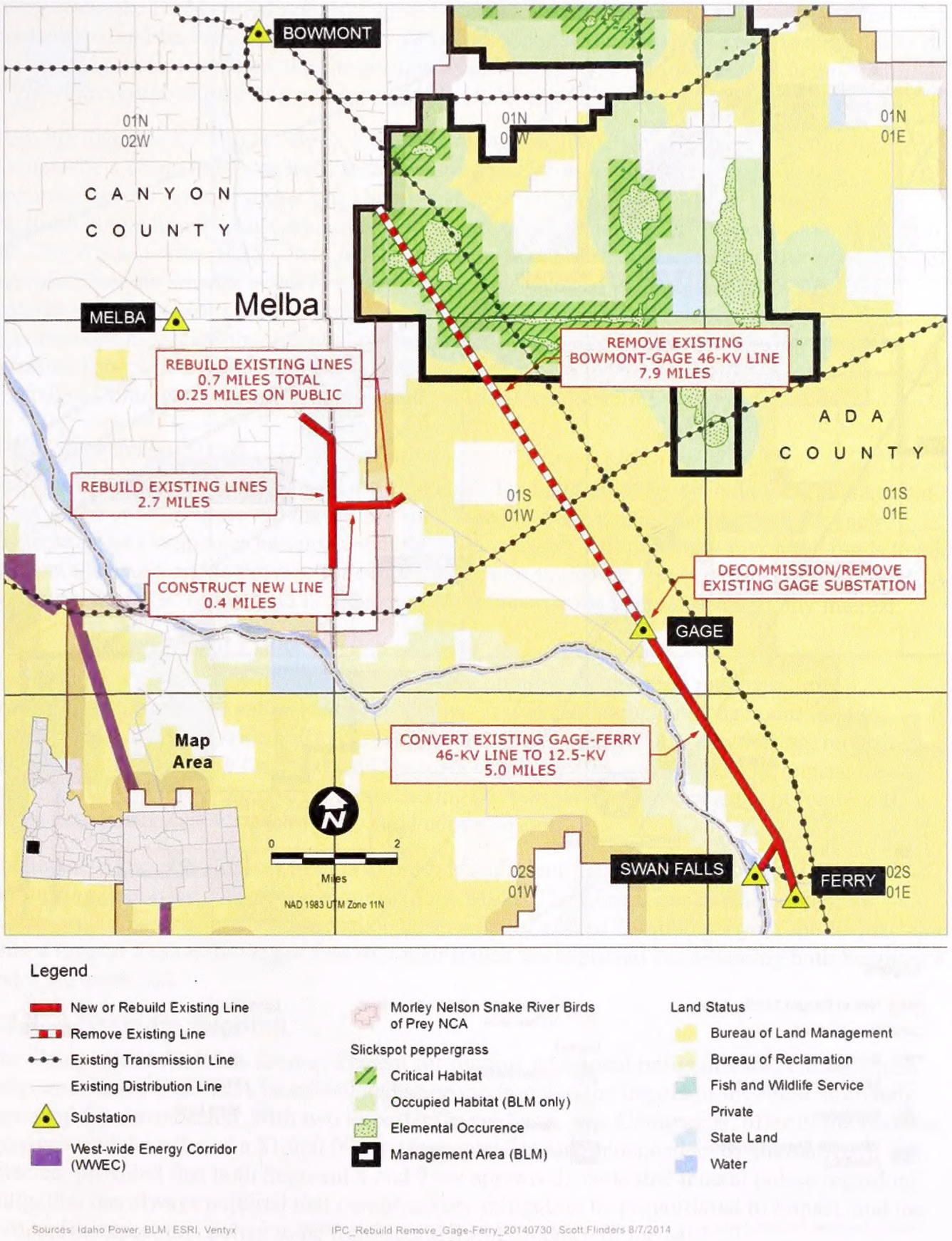

Figure 3. Proposed Swan Falls to Bowmont Transmission Line Modifications

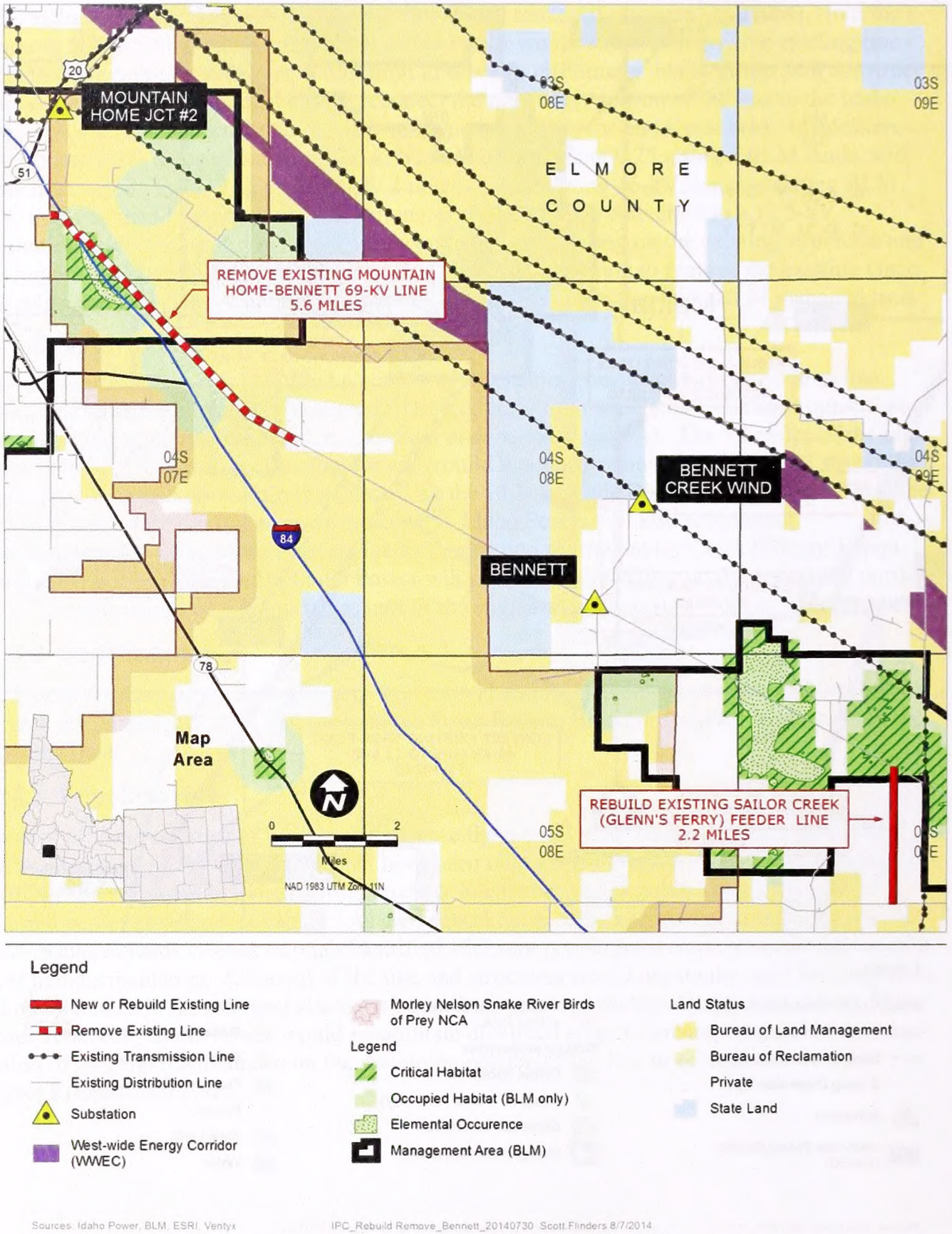

Figure 4. Proposed Mountain Home to Bennet Transmission Line Modifications

In the event the BLM would request that one or more structures be in place (conductor and hardware would be removed leaving any cross arms in place) and agree to take responsibility of maintaining those structures, the Companies would not remove the identified structures in order to provide continued perching and nesting opportunities to birds of prey.

Through discussions with the Boise RAC subcommittee, the Companies acknowledge this Committee's desire to strategically install nesting platforms to further enhance nesting opportunities for birds of prey. The Companies have not included this as an element of the Portfolio at this time because an agreement on advisability and placement must be reached with the USFWS and with BLM. The Oversight Committee may then elect to fund the installation of nest platforms on structures left in place as one of the selected enhancement projects. The installation of any nest platform must take into consideration current nesting and perching opportunities as well as the potential impact to the Companies regarding ability to maintain infrastructure within the BOPNCA. The Companies would expect to coordinate with the Oversight Committee regarding appropriate nest platform locations.

6.2 Portfolio Fund

The Companies intend to fully fund the agreed MEP, and to do so by providing the full amount to the BLM or to an approved third-party fund manager with a one-time payment for each Segment. The Companies anticipate that the fund manager will prudently invest the funds to add value to the funds and to provide for even more opportunities for enhancement for the BOPNCA. However, the value of the fund is calculated without assuming accumulation of any interest.

6.2.1 Management Fund

The funding will cover the direct costs of restoration projects, property purchase, law enforcement, and visitor enhancement programs. It will also include management funding, which is intended to provide sufficient funding for annual costs such as monitoring, reporting, and administration of the fund and the Oversight Committee (Committee). The management funding will also cover the cost of administering the mitigation and enhancement fund itself, which may be accrued by a third party fund administrator.

The intent of the management fund is to provide sufficient funding to support needed monitoring, reporting, and administration of the MEP. The Companies estimate that total monitoring, reporting, and administration costs will not exceed $50,000 per year for 20 years and offer a total of $1,000,000 regardless of which routes are approved but assuming both Segment 8 and 9 are approved.

6.2.2 Basis for Funding

The Companies assert that the requirement for funding additional mitigation and enhancement programs for the BOPNCA be considered as proportional to the impact of the route ultimately approved for construction, with two important exceptions. The Companies' offer of the two line removals and the offer of a $1,000,000 management fund are independent of alternatives selected, provided that both Segment 8 and 9 are approved. Note that federal policy regarding mitigation has always required that compensatory mitigation be proportional to impact, and the companies expect this policy to be followed in the acceptance of the MEP.

The Companies are not experts in any of the proposed projects with the exception of the line removals. The Companies will take full responsibility for execution of the agreed line removals

with BLM oversight for compliance with agreed EPMs and Environmental Protection Plans. However, the Companies do not plan to execute any of the other projects within the BOPNCA. Instead, they propose to provide funding to the BLM for these projects. Since BLM is to execute the projects with the guidance, monitoring, and reporting of the Oversight Committee, the Companies expect the BLM to also be responsible for the execution. This means that the BLM will utilize adaptive management and continually evaluate the success of projects. Because the value of the MEP has been established proportional to impact and because the BLM will be responsible for execution, the Companies will be responsible for the full agreed-upon value of the MEP but will not be liable for any further costs associated with this MEP beyond the agreed value of the fund.

The mechanism of providing said funding will be determined at a later date through coordination with the BLM, based on the mechanisms available to the Companies as regulated utilities, and may include a third party fund manager.

6.2.2.1 Timing for Funding

Through development of this MEP, the Companies commit to providing funding, commensurate with acres occupied and impacted by Project facilities, to forward the "conservation, protection and enhancement of raptor populations and habitats and the natural and environmental resources and values associated therewith" for which the BOPNCA was created. The Companies will provide a proportional amount of the total, based on federally managed lands within the BOPNCA crossed by the approved routes by segment, as a term and condition of receiving a NTP. For Proposed Segment 8, 28 percent would be provided prior to issuance of an NTP for Segment 8. For Proposed Segment 9, 72 percent of the amount would be provided prior to issuance of an NTP for Segment 9. These percentages are based on the number of miles crossed for each segment. The Companies may request the NTP for each Segment separately and propose this means of recognizing the relative impact of the two segments. The intent is to provide the full amount of the funding for both Segments as their construction is imminent. Percentages would vary if other routes were authorized.

6.2.2.2 Fund Value for Proposed Routes

As specified in the project descriptions in Section 6.1, the fund value for the RAC-Recommended Routes is summarized in Table 9, below.

Additional details are found in Appendix B, where assumptions for each project type are specified.

Table 9. MEP Fund Value for Proposed Routes for Segments 8 and 9

Project Type	Mitigation Component	Enhancement Component	Totals
Habitat Restoration	$174,780	$2,526,660	**$2,701,440**
Property Purchase	NA	$320,000	**$320,000**
Law Enforcement	$350,000	$1,750,000	**$2,100,000**
Visitor Enhancement	NA	$500,000	**$500,000**
Management Fund	Covered under enhancement	$1,000,000	**$1,000,000**
Line Removal	NA	$1,922,000	**$1,922,000**
Subtotal by Component	**$524,780**	**$8,018,660**	**$8,543,440**

6.2.2.3 Fund Value for Final EIS BLM-Preferred Alternatives

The BLM-Preferred Alternatives have far less impact on the BOPNCA than the Companies' Proposed Routes. Based on the miles crossed, the Final EIS Preferred Alternatives have about 20 percent of the impact of the Proposed Routes. Therefore, the fund value for those alternatives is substantially less, in proportion to impact. The management fund and the offer of removal of lines remains the same provided both Segments 8 and 9 are approved. Table 10, below, summarizes the fund value by component for the Final EIS BLM-Preferred Alternatives.

Table 10. MEP Fund Value for BLM-Preferred Routes for Segments 8 and 9

Project Type	Mitigation Component	Enhancement Component	Totals
Habitat Restoration	$64,800	$709,200	**$774,000**
Property Purchase	NA	$64,000	**$64,000**
Law Enforcement	$70,000	$350,000	**$420,000**
Visitor Enhancement	NA	$100,000	**$100,000**
Management Fund	Covered under enhancement	$1,000,000	**$1,000,000**
Line Removal	NA	$1,922,000	**$1,922,000**
Subtotal by Component	**$134,800**	**$4,145,200**	**$4,280,000**

6.2.3 Oversight Committee

The Companies propose the establishment of an Oversight Committee (Committee) that will provide guidance and oversight for the management and implementation of the fund.

6.2.3.1 Committee Composition

The Companies will work with the BLM to determine a broad stakeholder base for the Committee. Preliminary considerations for membership could include:

- BLM Director of BOPNCA (chair)
- Representative from Boise State University Raptor Research Center
- Representative from the Idaho Governor's Office of Species Conservation

- Representative from the Idaho Department of Fish and Game
- Representative from counties crossed by the proposed routes
- Representative from one or more involved NGOs (Peregrine Fund, Hawks Unlimited, Audubon Society, etc.)
- Representative from the Great Basin Consortium
- Representative from NRCS

6.2.3.2 Committee Responsibilities

- Committee Governance: The Committee will identify governance rules that include, but are not limited to, the following:
  - How requests to participate from groups/individuals not initially identified will be evaluated and addressed.
  - How decisions will be made (e.g., by majority or consensus).
  - How and when to solicit project proposals and criteria that will be used to evaluate proposals.
  - How often and where to meet.
  - Responsibility for preparing annual and five-year reports.
- Project Selection: While the fixed funding amount in this MEP was developed from a preliminary list of likely projects, the Committee will have the responsibility and authority to determine the actual funding allocation (project mix) and types of projects. If project types vary from those considered in this MEP, they must be consistent with the intent of the MEP and must be related to Project-related impacts.
- Implementation Oversight: The Committee will be responsible for providing oversight of the implementation of projects and for assuring that the funding is used as intended and is properly documented.
- Oversight of Monitoring and Reporting: The Committee will also be responsible for assuring that the projects funded through this MEP are successful, and that appropriate monitoring and reporting are conducted. Reports should be available to the public as well as to the Companies as completed.
- The Committee will be responsible for ensuring that selected projects have considered, and are designed for, long-term sustainability. For example, habitat restoration projects should include contingencies to address noxious weeds, fires (e.g., recovery and/or fire breaks), etc.

6.2.3.3 Committee Administration and Compensation

The Companies anticipate that the Committee will need to meet a maximum of two times per year and that most if not all meetings can be conducted by webinar or telephone conference. The Companies expect that management funding will include a component of compensation for Committee members requesting compensation and to cover the costs of the organization and management of the Committee over the life of the restoration projects. The Companies further assume that all restoration projects will be implemented within 5 years following the completion

of construction and will achieve success within 20 years after completion of construction of the Project.

6.3 Monitoring and Reporting

6.3.1 Monitoring and Reporting for Project-wide Mitigation

This MEP specifically addresses *additional* mitigation and enhancement projects and activities, over and above the considerable commitment the Companies have already made to Project-wide avoidance, minimization, reclamation, and compensatory mitigation. However, the MEP does not relieve the Companies of their obligations under Project-wide environmental protection measures and plans. Environmental Protection Measures and Environmental Protection Plans will be applicable as appropriate throughout the BOPNCA. Those measures and Plans call for monitoring and reporting for which the Companies are responsible, though much of the monitoring and reporting will be conducted through a third-party compliance inspection contractor (CIC; See the Environmental Compliance and Monitoring Plan and other relevant plans already submitted and approved as part of the Project (BLM 2013 ROD)).

6.3.2 Monitoring and Reporting for Line and Substation Removal

The Companies will be responsible for routine environmental compliance, which includes monitoring and reporting during construction as well as post-construction monitoring and reporting of reclamation, during line and substation removal and associated reconstruction of existing lines. Environmental Protection Plans developed for the Project will be applicable (see the Environmental Compliance and Monitoring Plan, Reclamation Plan, Noxious Weed Plan, SWPP Plan, and other relevant plans already submitted and approved as part of the Project [BLM 2013 ROD]).

6.3.3 Monitoring and Reporting for BOPNCA-Required Additional Mitigation and Enhancement

The Companies anticipate that the use of the funding proposed herein will be accompanied by a rigorous program of monitoring and reporting. As proposed, the Committee will be responsible for determining the methods and timing of monitoring and reporting for each project funded, including restoration, property purchase, law enforcement, visitor enhancement, and any other projects funded.

In particular, the Companies anticipate that each restoration project recommended for funding to the Committee should present expected future conditions and criteria for determining success and be accompanied by a monitoring and reporting plan. The level of monitoring and reporting and success criteria may differ from project to project. The Committee maintains the flexibility of establishing and requiring appropriate monitoring and reporting and success criteria commensurate with the project that the Committee has elected to fund. The projects funded by the Committee would be treated as any other mitigation project in this regard. The Committee will be responsible for determining the entity or entities responsible for implementing the project and for its monitoring and reporting as well as funding to address potential for project failure. The value of Management Funding, discussed above, includes the cost of monitoring and reporting. It is expected that an overall monitoring report would be prepared for all projects so funded annually for the first 5 years, followed by a summary report every 5 years thereafter for 20 years. Monitoring reports would be made public and copies provided to the Companies.

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APPENDIX A
APPLICABILITY OF ENVIRONMENTAL PROTECTION PLANS AND MEASURES TO THE BOPNCA

Table 1 describes the Environmental Protection Plans (EPPs) that the Companies will use to ensure environmental protection during construction, operation, and maintenance. All EPPs are stand-alone documents that contain complete lists of all Environmental Protection Measures (see Table 2) and other specific stipulations and methods for that environmental resource. The management plans and plan methodologies have been developed jointly by the Companies and the BLM with input from the USFS and other cooperating agencies. The Companies will be responsible to ensure their contractors and employees follow these plans. EPPs which apply to Morley Nelson Snake River Birds of Prey National Conservation Area (SRBOP or NCA) are identified.

Table 1

Environmental Protection Plans Applicable to the Morley Nelson Snake River Birds of Prey National Conservation Area

EPP Description	Appendix Designation (POD)	Applicable to SRBOP
The **Environmental Compliance Management Plan** is the primary guidance document that states how the Companies uphold, document, and manage compliance with the ROW grant, the POD, landowner agreements, and all federal, state, and local permits. It is a centralized Project environmental compliance reference and is thereby intended to facilitate environmental compliance across the entire Project.	Appendix C	Yes
The **Framework Reclamation Plan** includes construction mitigation, reclamation, and revegetation measures for each land management area crossed by the ROW within BLM-managed and National Forest lands. It will combine the Companies' best management practices (BMPs) with site-specific mitigation developed in consultation with agencies. Some measures will apply Project-wide, while others will be designed for specific areas.	Appendix D	Yes
The **Framework Noxious Weed Plan** provides methods to control the potential occurrence/infestation of noxious and invasive weeds during and following construction of the Project. The purpose of the plan is to ensure noxious weeds are identified and controlled during the construction of Project facilities and all federal, state, county, and other local requirements are satisfied.	Appendix E	Yes
The **Framework Stormwater Pollution Prevention Plan** includes measures for temporary and permanent erosion and sediment control that will be used during construction, operation, and maintenance of the transmission line and ancillary facilities.	Appendix F	Yes

Environmental Protection Plans and Documents (continued)

Description	Appendix Designation (POD)	Applicable to SRBOP
The **Framework Spill Prevention, Containment, and Countermeasures Plan** includes measures for spill prevention practices, requirements for refueling and equipment operation near waterbodies, procedures for emergency response and incident reporting, and training requirements.	Appendix G	Yes
The **Plant and Wildlife Conservation Measures Plan** presents the measures proposed by the Companies for avoidance and minimization of impacts to plant and wildlife species as related to construction activities for the Project and outlines specific conservation measures to be implemented in the event that state or federally listed species, BLM sensitive species, or USFS special status species or their habitats are identified within or adjacent to the Project ROW.	Appendix H	Yes
The **Framework Stream, Wetland, Well, and Spring Protection Plan** provides measures to protect these resources from potential impacts during construction, operation, and maintenance activities. The goals of this plan are to control Project-related erosion and sedimentation into streams and wetlands, minimize disturbance and erosion of streambeds and banks, and protect springs and wells in the Project area from impacts due to blasting and hazardous materials contamination.	Appendix I	Yes
The **Framework Paleontological Resources Protection Plan** identifies the mitigation measures needed to avoid or reduce Project-related impacts to paleontological resources, wherever feasible. This plan provides important background and contextual information useful for the paleontological resources mitigation program.	Appendix J	Yes
The **Agricultural Protection Plan** includes measures intended to mitigate or provide compensation for agricultural impacts that may occur due to construction of the Project. The measures are intended to be implemented on partially or wholly owned private agricultural land unless directed otherwise by the landowner.	Appendix K	No
The **Framework Traffic and Transportation Management Plan** includes measures that require compliance with federal policies and standards relative to planning, siting, improvement, maintenance, and operation of roads for the Project.	Appendix L	Yes
The **Framework Blasting Plan** outlines methods to prevent adverse impacts to human health and safety, property, and the environment that could potentially result from the use of explosives during Project construction and mitigate risks and potential impacts associated with blasting procedures that may be required for construction.	Appendix M	Yes
The **Framework Erosion, Dust Control and Air Quality Plan** provides measures to ensure protection of the air quality that will be affected by the Project. This plan is to be implemented during the construction, operation, and maintenance phases of the Project. These measures are intended to minimize dust and emissions from construction-related activities.	Appendix N	Yes

Environmental Protection Plans and Documents (continued)

Description	Appendix Designation (POD)	Applicable to SRBOP
The **Framework Fire Prevention and Suppression Plan** includes measures to be taken by the Companies and their contractors to ensure that fire prevention and suppression measures are carried out in accordance with federal, state, and local regulations. The plan addresses the specific requirements of the USFS and BLM and provides BMPs for fire management on privately owned lands.	Appendix O	Yes
The **Framework Hazardous Materials Management Plan** reduces the risks associated with the use, storage, transportation, production, and disposal of hazardous materials (including hazardous substances and wastes). This plan identifies Project-specific mitigation measures and other specific stipulations and methods to address spill prevention, response, and cleanup procedures for the Project.	Appendix P	Yes
The **Framework Construction Emergency Preparedness and Response Plan** provides an overview of methods to be implemented if the need for emergency management is imminent. This document will describe the existing support structure, chain of command, and emergency communications protocols.	Appendix Q	Yes
The **Operations, Maintenance, and Emergency Response Plan** includes measures to be employed while conducting routine, corrective, and emergency operations and maintenance activities. Measures identified are in compliance with applicable state and federal laws and policies; and will ensure consistency across and within federal jurisdictions; allowing for the Companies to access the transmission line and ancillary facilities in a timely, cost effective, and safe manner.	Appendix R	Yes
The **Cultural Resources Protection Plan** identifies the mitigation measures needed to avoid or reduce Project-related impacts to cultural resources, wherever feasible. This plan provides important background and contextual information useful for the cultural resources protection program and appends the Programmatic Agreement (PA), Project-wide Historic Properties Treatment Plan (HPTP), Monitoring Plan, Inadvertent Discovery Plan, and Native American Graves Protection and Repatriation Act (NAGPRA) Plan of Action.	Appendix S	Yes
The **Preconstruction Checklist** identifies when specific actions related to completion of plans are to take place as well as when Contractor-secured permits are to be applied for.	Appendix T	Yes
The **Framework Flagging, Fencing, and Signage Plan** describes the methods that will be used in the field to delineate limits of disturbance and protect sensitive environmental and cultural resources during Project construction.	Appendix U	Yes
PacifiCorp's Transmission Construction Standards provides standards for all aspects of transmission line construction.	Appendix V	Yes
PacifiCorp's Transmission and Distribution Vegetation Management Program Specification Manual and Idaho Power Company's Transmission Clearing Specifications and Framework for Managing Noxious Weeds cover the vegetation management programs for both distribution and transmission. They include program descriptions, specifications, and protocols.	Appendix W	Yes

Environmental Protection Plans and Documents (continued)

Description	Appendix Designation (POD)	Applicable to SRBOP
The **Land Description of Project Components on Federally Managed Public Lands** provides an Aliquot part subdivision down to the quarter-quarter section for the transmission line ROW, regeneration stations, substations, permanent and temporary access roads, and temporary multipurpose areas and fly yards.	Appendix X	Yes
Other Information includes Project documents such as the Biological Opinion and permits that have been issued.	Appendix Y	Yes
The **Environmental Protection Measures** are a list of all EPMs to be implemented for the Project and are organized by resource to provide an easy reference document.	Appendix Z	Yes

Table 2
Environmental Protection Measures Applicable to the Morley Nelson Snake River Birds of Prey National Conservation Area

EPM Number	Environmental Protection Measures	Applicable to SRBOP
OPERATIONS AND MAINTENANCE		
G-1	Resource Management Plan (as amended) design criteria, Best Management Practices (BMPs), and mitigation requirements will apply on BLM-managed lands.	Yes
G-2	Forest Plan Standards and Guidelines (as amended) will apply on National Forest System (NFS) lands. Ground-disturbing and vegetation management activities will comply with all Agency-wide, regional, and state BMPs.	Yes
G-3	Third-party Environmental Compliance Inspection Contractor (CIC) Monitors approved by the Agencies will monitor construction activities. Monitoring activities will be structured in accordance with the Environmental Compliance Management Plan included as Appendix C of the Plan of Development.	Yes
G-4	All wildlife and plant surveys/preconstruction surveys will be considered as "casual use" activities and will not be restricted or prevented to occur due to overlapping season and temporal restrictions.	Yes
OM-1	The Companies will comply with the road maintenance standards of the federal or state agency controlling the land.	Yes
OM-2	Roads will be maintained to have crossroad drainage in order to minimize the amount of channeling or ditches needed. Water bars will be installed at all alignment changes (curves), significant grade changes, and as requested by the federal or state agency.	Yes
OM-3	All access road drainage structures, constructed and installed for the Companies' use only, will be maintained or repaired by the Companies during O&M activities or emergency response.	Yes
OM-4	Although routine and corrective O&M is of limited duration and impact, the Companies will attempt to adhere to specific closure periods and areas and are proposing not to conduct any routine and corrective O&M activities during the timeframes and at the locations identified in Appendix R of the Plan of Development to the greatest extent practical. The appropriate federal or state agency will notify the Companies of any spatial or temporal restrictions that are in effect for the Project area (e.g., fire restrictions) that would be applicable to corrective O&M activities.	Yes
OM-5	Existing improvements (fences, gates, etc.) will be repaired or replaced if they are damaged by O&M activities, as agreed to by the parties involved.	Yes
OM-6	The Agencies may restrict general public access to closed federal or state roads and access roads that the Companies maintain (the Companies will maintain access roads constructed for the Companies' use only). In cases of restricted access, the Companies will physically close the road with a gate. Gates will be locked with both a lock supplied by the Companies and with a federal agency lock. Access management will be updated as necessary to reflect current road closures and gate locations.	Yes
OM-7	Any integrated vegetation management (IVM) control method, including those listed in Appendix R of the Plan of Development, may be used to control the growth of trees and tall shrubs to maintain clearances (the IVM recommended wire and border zones as indicated in Appendix R of the Plan of Development) and improve access to facilities.	Yes
OM-8	Any IVM control method including those listed in Appendix R of the Plan of Development may be used to control the growth of additional vegetation to maintain clearances, the IVM recommended wire and border zones as indicated in Appendix R, and improve access to facilities.	Yes
OM-9	Where possible, low-growing vegetation and small tree species within the right-of-way (ROW) that will not grow into the minimum required clearance distance will be left in place; trees may be removed on a subsequent maintenance cycle as they increase in size. Hazard trees are typically those trees or snags within or adjacent to the ROW that are likely to interfere with or fall into transmission lines or associated facilities. Hazard trees and other "hot spots" (high priority areas requiring vegetation management actions) are identified during routine line inspections and removed annually. In addition to hazard trees, other critical conditions that may require immediate attention include trees that interfere with transmission conductors and trees whose growth will not allow safe clearance until the next scheduled maintenance cycle.	Yes
OM-10	Any vegetation control method may be used for vegetation maintenance on access roads; this is typically scheduled at the same time as vegetation maintenance within the ROW. However, in cases where vegetation grows quickly, removal may occur annually. Vegetation that will not interfere with the safe operation of vehicles and equipment will be left in place.	Yes

EPM Number	Environmental Protection Measures	Applicable to SRBOP
OM-11	Slash will be lopped and scattered throughout the surrounding land. Stumps resulting from vegetation treatments will not be over 1 foot tall (unless the tree is not able to be safely cut at or below one foot from the ground surface), and lopped slash will be left as close to the ground as possible. Lopped slash will be a maximum of 18 inches in length for small trees and limb wood. If the federal land managing agency determines that fuel levels are unacceptable, they shall notify the Companies and develop a mutually agreed upon method to reduce fuels. This may include, but is not limited to, chipping.	Yes
OM-12	Hazard trees will be felled in a direction away from the ROW. Slash and limbs that fall within the ROW will be treated as described above; boles of trees greater than 8 inches will be left in place.	Yes
OM-13	Any chemical control will be done in accordance with any applicable local, state, and federal rules and regulations. Pesticides or other chemical control will be selected from the BLM and USFS lists of previously approved pesticides and in accordance with any pesticide plans. If the federal land managing agency determines that a previously approved pesticide and/or plan is unacceptable, they shall notify the Companies.	Yes
OM-14	Before beginning an O&M project on federal or state land, the Companies or their subcontractors will clean all equipment that will operate off-road or disturb the ground. Tracks, skid plates, and other parts that can trap soil and debris will be removed for cleaning when feasible, and the entire vehicle and equipment will be cleaned at an off-site location.	Yes
OM-15	To help limit the spread and establishment of noxious weed species in disturbed areas, desired vegetation needs to be established promptly after disturbance. The Companies will rehabilitate significantly disturbed areas as soon as possible after ground-disturbing activities and during the optimal period. Seed and mulch will be certified "noxious weed free" and seed mix will be agreed to in advance by the landowner or land managing agency.	Yes
OM-16	Routine and corrective O&M activities in streams with sensitive fish species will occur from July 1 to September 1 in an effort to minimize impact to spawning and migration activities. These activities include, but are not limited to, culvert installation and/or replacement and stream bank stabilization. Fording streams at existing crossings on existing roads (e.g., dip, culvert, bridge) will occur as necessary throughout the year.	Yes
OM-17	Woody vegetation management within 50 feet of streams will be conducted by hand crews.	Yes
OM-18	Herbaceous plants and low-growing shrubs will be left in place if they do not interfere with the safe O&M of Project lines and equipment as described in Appendix R of the Plan of Development.	Yes
OM-19	The Companies will use existing stream crossings or new, permanent crossings that were approved as part of the Project, and will not create additional crossings without prior agency permitting and approval.	Yes
OM-20	Only pesticides approved by the land managing agency as safe to use in aquatic environments and reviewed by the Companies for effectiveness will be used within 100 feet of sensitive aquatic resources or in areas with a high leaching potential.	Yes
OM-21	Prior to the start of O&M activities, all supervisory personnel will be instructed on the protection of natural resources, including sensitive plant and wildlife species and habitats. If a contractor is used, the construction contract will address (a) the sensitive plant species that may be present in a particular area based on previous surveys and literature review; (b) the federal and state laws regarding protection of plants and wildlife; (c) the importance of these resources; (d) the purpose and necessity of protecting them; and (e) methods for protecting sensitive resources (e.g., Endangered Species Act, Migratory Bird Treaty Act, Bald and Golden Eagle Protection Act, and BLM wildlife policy).	Yes
OM-22	Sensitive plant populations that occur within or near the ROW and work areas will be marked on the ground, where practical, to ensure that they are avoided. If species are discovered during the work, the Companies will establish a spatial buffer zone, will contact the appropriate Agency within 24 hours, and will continue with the O&M activities outside of the established buffer unless otherwise directed. The Agency may evaluate the adequacy of the buffer on a case-by-case basis. Unless the Companies are informed otherwise, work outside of the buffer area will continue. If the Companies need to work within the buffer area, the Agencies and Companies will work together to develop a solution that is acceptable to both parties and will allow for the Companies to complete the work in a timely manner or within the scheduled outage window, if applicable. After the O&M activities are completed, or will no longer poses a threat to the plant population, the marking (stakes), if used, will be promptly removed to protect the site's significance and location from unwanted attention. As needed, marking will be reinstated during the land rehabilitation period.	Yes

EPM Number	Environmental Protection Measures	Applicable to SRBOP
OM-23	If sensitive wildlife species are discovered during O&M activities, and the animals are not directly within ground disturbance areas, they will be protected by marking the edges of the ROW and new access roads in the general vicinity to ensure that workers do not leave those areas. If the animals are within work areas that have, or will have, ground disturbance, the Companies will establish an appropriate buffer zone and will contact the federal or state land manager immediately. The federal or state agency may evaluate the adequacy of the buffer on a case-by-case basis. Unless the Companies are informed otherwise, work outside of the buffer area will continue. If the Companies need to work within the buffer area, the Agencies and Companies will work together to develop a solution that is acceptable to both parties and will allow for the Companies to complete the work in a timely manner or within the scheduled outage window, if applicable. After the O&M activities are completed, or will no longer pose a threat to the species, the marking (stakes) will promptly be removed to protect the site's significance and location from unwanted attention. As needed, marking will be reinstated during the land rehabilitation period.	Yes
OM-24	The Companies will provide crews and contractors with maps showing environmentally sensitive areas; these maps will include work zones as well as ROW areas where ground disturbance will be avoided.	Yes
OM-25	In the event any sensitive plants require relocation, permission will be obtained from the federal agency. If avoidance or relocation is not practical, the topsoil surrounding the plants will be salvaged, stored separately from subsoil, and respread during the restoration process.	Yes
OM-26	If sensitive wildlife species are killed or injured due to O&M activities, the appropriate federal agency will be notified.	Yes
OM-27	All on-site personnel will be made aware that all birds of prey are protected by federal and state laws.	Yes
VISUAL		
VIS-1	The 500-kV transmission line lattice steel towers will be specified to have a dull galvanized finish. The proposed surface finish is a galvanized finish, treated after the initial galvanizing process to produce a dulled finish to reduce surface reflectivity. This process results in an installed tower with more visual absorption and thus allows the towers to blend in better with the landscape.	Yes
VIS-2	The three subconductors (500-kV) and two subconductors (230-kV) that make up the conductor bundles will be specified to have a non–specular finish. Similar to the dulled finish of the transmission structures, the conductors reduce surface reflectivity. This process results in eliminating the shiny ribbon effect often seen in older untreated transmission lines and thus allows the conductors to blend in better with the landscape.	Yes
VIS-3	The proposed 230-kV transmission lines between Windstar and Aeolus will use a steel H-frame structure configuration similar to the existing 230-kV line in the same general location. The steel pole H-frame will utilize self-weathering steel. Self-weathering steel is manufactured from a group of steel alloys that were developed to eliminate the need for painting. This type of steel alloy forms a stable rust-like appearance if exposed to the weather for several years. In areas where the 230-kV structures are skylined, dull galvanized steel will be considered to minimize visual impacts. Dulled galvanized steel has a galvanized finish, treated after the initial galvanizing process to produce a dulled finish to reduce surface reflectivity. This process results in an installed tower with more visual absorption and thus allows the towers to blend in better with the terrain, while at the same time preserving the corrosion resistant properties of the galvanized coating on the steel.	No
VIS-4	No paint or permanent discoloring agents will be applied to rocks or vegetation to indicate limits of survey or construction activity except as required under the timber sale contracts.	Yes
VIS-5	To minimize ground disturbance and/or reduce scarring (visual contrast) of the landscape, the alignment of any new access roads or cross-country routes will follow the landform contours where practicable, providing that such alignment does not impact resource values additionally or result in new impacts to resources that were previously avoided.	Yes
VIS-6	To minimize sensitive feature disturbance and/or visual contrast in designated areas on federal lands, structures will be placed so as to avoid sensitive features such as, but not limited to, riparian areas, water courses and cultural sites and/or to allow conductors to clearly span the features, within the limits of standard tower design. Where conflicts arise between resources, the applicable land manager will be consulted.	Yes
VIS-7	To reduce visual impacts on federal land, including potential impacts on recreation values and safety, towers will be placed at the maximum feasible distance from the highway, canyon and trail crossings within limits of standard design and to the extent practical.	Yes
VIS-8	Crossings of rivers shall be at approximately right angles where practical. Strategic placement of structures will be done both as a means to screen views of the transmission line and ROW and to minimize the need for vegetative clearing.	Yes
VIS-9	Insulators will be made of materials that have reduced potential to reflect and refract light. Glass insulators that are highly reflective will not be permitted in scenic areas on federally managed lands.	Yes

EPM Number	Environmental Protection Measures	Applicable to SRBOP
VIS-10	For segments of the line 1) within the 0- to 0.5-mile zone of Interstate highways where existing lines of the same voltage are paralleled and 2) within the 0- to 0.5-mile zone of residences where existing lines of the same voltage are paralleled, new towers will be located adjacent to existing towers, within the limits of standard transmission line design and considering the ruling span length of adjacent proposed and existing lines.	Yes
VIS-11	Site-specific "micrositing," within the limits of standard engineering design, will be required near certain sensitive areas, as identified by the agencies, where proposed transmission facilities will impact visual quality; these situations include: • Crossings over major highways; • Crossings of high quality historic trails; • Crossings over the North Platte and Snake Rivers; • Sensitive travelways, use areas, residential areas, recreational facilities as identified by the agencies (including national recreation and scenic trails, campgrounds, recreation areas, and trailheads), and other areas identified by management plans; and • To avoid bisecting forest patches within the Sawtooth NF. The Companies will consult with the applicable local land management agency during transmission line design.	Yes
VIS-12	The lighting specified for the marshaling yards will be the minimum required to meet safety and security standards. All light fixtures within 1,000 feet of a residence will be hooded to eliminate any potential for glare and to prevent light from spilling off the site or up into the sky. Additionally, the fixtures will have sensors and switches to permit the lighting to be turned off at times when it is not required.	Yes
VIS-13	To reduce visual contrast in areas where overstory vegetation is removed for access, tower pads, or conductor clearance, specific sections of the ROW on federal land will have uneven edges (trees will be removed from the edge of the ROW out or away from the ROW boundary) to give a natural appearance, where not in conflict with regulatory requirements (e.g., NERC, WECC, and Occupational Safety and Health Administration requirements). This will be a onetime application (not applicable to operations and maintenance) and conducted with agency approval.	Yes
VIS-14	To mitigate potential visual impacts on federal land, the construction and maintenance plan, to be developed by the Companies, will include measures to reduce ROW scarring and enhance restoration. The plan will be approved by the land management agency prior to ground clearing and construction.	Yes
VIS-15	If Alternative 7K is selected, Natina stain (or an equivalent product) will be applied to towers (including lattice towers) placed on NFS lands within the Sawtooth NF to reduce visual effects at the middleground level. Note that this is an agency imposed measure.	No
CULTURAL		
CR-1	All work conducted in accordance with the Historic Properties Treatment Plan (HPTP) will be performed by qualified archeologists with trained assistants.	Yes
CR-2	An Inadvertent Discovery Plan will be included as part of the HPTP. This plan will specify what steps will be taken if a subsurface cultural resource is discovered during construction, including stopping construction in the vicinity of the find, notification of the appropriate land management agency, identification of a qualified archaeologist to conduct an evaluation of the find, and the development of an approved data recovery program or other mitigation measures.	Yes
CR-3	The Cultural Resources Protection Plan will include provisions for the preparation and curation of artifacts from federal lands and for the preparation of a final report based on the data recovered for activities on federal lands.	Yes
CR-4	Literature reviews and Class III surveys will be completed for cultural resources. A literature review will be conducted on public and private lands and will cover a study area of one-half mile on either side of the proposed and alternate transmission line alignments as well as areas identified for use as multi-purpose areas and access roads. Class III surveys covering the Area of Potential Effect (APE) as specified in the Programmatic Agreement will be completed. A Class II Sample Survey was conducted that consisted of an intensive pedestrian survey of 15 percent of the length of all alternatives. One-mile long by 500-foot wide transect strips were surveyed along proposed and alternative routes on federal lands only, for use in detailed analysis in the EIS. This also included a detailed preliminary assessment of effects on historic trails on all lands within the APE, including existing trail condition and a visual effects assessment.	Yes
CR-5	If construction will adversely affect any properties listed on, or eligible for listing on, the National Register of Historic Places (NRHP), mitigation will be required. Mitigation will be in accordance with the HPTP and may include, but not be limited to, one or more of the following measures: a) avoidance through the use of relocation of structures through the design process, realignment of the route, relocation of temporary workspace, or changes in the construction and/or operational design; b) the use of	Yes

EPM Number	Environmental Protection Measures	Applicable to SRBOP
	landscaping or other techniques that will minimize or eliminate effects on the historic setting or ambience of standing structures; and c) data recovery, which may include the systematic professional excavation of an archaeological site or the preparation of photographic and/or measured drawings documenting standing structures.	
CR-6	Avoidance areas will be flagged or otherwise marked prior to construction activities. Flagging or other marking will be removed once construction is completed in an area.	Yes
CR-7	To minimize unauthorized collecting of archaeological material or vandalism to known archaeological sites, all workers will attend mandatory training on the significance of cultural resources and the relevant federal regulations intended to protect these resources.	Yes
CR-8	If human remains are discovered, construction will be halted and the coroner will be notified and measures specified in the HPTP will be followed.	Yes
CR-9	On NFS lands, a management plan should be developed for each historic property nominated to the NRHP. The plan should be drafted during the nomination process. The National Heritage Strategy should be used to guide decisions on issues related to the Heritage Program.	No
RECLAMATION		
WEED 1 – 3, and 6 – 18	(Described under Weeds)	Yes
WQA 32, 34, and 35	(Described under Water Quality)	Yes
REC-1	The Companies' personnel and their contractor will be trained on noxious and invasive weed identification to facilitate avoidance of infestations where possible or identification of new infestations.	Yes
REC-2	Preconstruction weed treatment will be conducted prior to the start of ground-disturbing activities and at the time most appropriate for the target species.	Yes
REC-3	Preconstruction weed treatment will be limited to the areas that are expected to have surface-disturbing activities. The Final Reclamation Plan will include a schedule showing the phased in-service dates for different segments. Preconstruction weed treatment will be scheduled accordingly.	Yes
REC-4	Preconstruction treatment may use mechanical control, hand spraying, grazing, or pesticides. The Final Reclamation Plan will discuss those options, as applicable.	Yes
REC-5	All pesticide applications will comply with label restrictions, federal, state and/or county regulation, the Companies' specifications and landowner agreements. No spraying will occur prior to notification of the applicable land management agency. On federal or state controlled lands, a pesticide use plan will be submitted prior to any pesticide application as recommended in the BLM herbicide EIS (http://www.blm.gov/wo/st/en/prog/more/veg_eis.html). The pesticide use plan will include the dates and locations of application, target species, pesticide, adjuvants, and application rates and methods (e.g., spot spray vs. boom spray). No pesticide will be applied to any private property without written approval of the landowner. The Final Reclamation Plan will contain a list of pesticides that may be used, target species, best time for application, application rates, and if they are approved for use on BLM-managed and NFS lands.	Yes
REC-6	Pesticides may be applied using a broadcast applicator mounted on a truck or all-terrain vehicle (ATV), backpack sprayers, or with hand sprayers as conditions dictate. Pesticide applications will be conducted only by licensed operators or under the supervision of a licensed operator. Vehicle-mounted sprayers (e.g., handgun, boom, and injector) may be used in open areas readily accessible by vehicle. Where allowed, a broadcast applicator will likely be used. In areas where noxious weeds are more isolated and interspersed with desirable vegetation, noxious and invasive weeds will be targeted by hand application methods (e.g., backpack spraying), thereby avoiding other plants. Preconstruction pesticide applications will not occur within 100 feet of known special status species. Calibration checks of equipment will be conducted at the beginning and periodically during spraying to ensure proper application rates are achieved.	Yes
REC-7	All areas treated will be documented using GPS technologies and included in the annual report.	Yes
REC-8	Areas of existing noxious weeds and invasive species will be avoided where possible to reduce the risk of spread.	Yes
REC-9	Project vehicles will arrive at the job site clean of all soil and herbaceous material. The Construction Contractor will ensure vehicles and equipment are free of soil and debris capable of transporting noxious weed seeds, roots, or rhizomes before the vehicles and equipment access the Project. The CIC will inspect vehicles to ensure compliance.	Yes
REC-10	When the Construction Contractor demobilizes from the job site where identified infestations of noxious weeds are present, they will use appropriate decontamination measures as defined in the Final Reclamation Plan.	Yes
REC-11	Soil stockpiles from areas that did not have noxious weeds or invasive species present, will not be placed	Yes

EPM Number	Environmental Protection Measures	Applicable to SRBOP
	adjacent to populations of noxious weeds or invasive species, where practicable.	
REC-12	Areas disturbed by Project activities are susceptible to the establishment and spread of noxious weeds. Erosion control measures identified in the SWPPP(s) will also assist in preventing the establishment of weeds on exposed soils.	Yes
REC-13	Project-related storage and multi-purpose areas, fly yards, and other areas that are subject to regular long-term disturbance will be kept weed-free through regular site inspections and pesticide applications, subject to the consent of the landowner.	Yes
REC-14	Where preconstruction surveys have identified noxious or invasive weed species infestations, topsoil and other soils will be placed next to the infested area and clearly identified as coming from an infested area. Movement of stockpiled vegetation and salvaged topsoil will be limited to eliminate the transport of soil-borne noxious weed seeds, roots, or rhizomes, and marked as containing noxious seed materials to avoid mixing with weed-free soil. Topsoil will be returned to the area it was taken from and will not be spread in adjacent areas. If the topsoil is not suitable for backfill, then it will be spread in another previously disturbed area and clearly identified for future weed treatments as applicable. As directed by the BLM or USFS, the Construction Contractor may be required to provide additional treatments (i.e., pre-emergent pesticides) to prevent return of noxious weeds.	Yes
REC-15	Straw or hay that may be used as a BMP to control erosion and sedimentation must be certified weed free. If certified weed-free materials are not available, then alternative BMPs will be used. The use of alternative BMPs will be coordinated with the construction storm water inspector.	Yes
REC-16	The topsoil layer will be removed, taking care not to mix it with the underlying sub-soil. Where topsoil separation is employed, topsoil will be stored in a separate stockpile.	Yes
REC-17	Certified weed-free straw, mulch, gravel, and other BMPs as appropriate, will be used as described in the SWPPP to stabilize the stockpile and limit erosion and standing water, control dust, and control the establishment of noxious or invasive weeds in stockpiled soils.	Yes
REC-18	Topsoil and sub-surface soils will be replaced in the proper order during reclamation.	Yes
REC-19	Where it is necessary to spread soils (subsurface soils or waste rock resulting from excavations or foundation drilling), it will be done where practicable and in close proximity to where the disturbance occurred (within the ROW). Material will be spread uniformly to match existing contours, covered with topsoil when available, and reseeded.	Yes
REC-20	Temporarily disturbed lands within the ROW will be recontoured to blend with the surrounding landscape. Recontouring will emphasize restoration of the existing drainage patterns and landform to preconstruction conditions, to the extent practicable. (Tower pads will not be recontoured.)	Yes
REC-21	De-compaction: Areas within the ROW, laydown or multi-purpose areas, and other areas of extensive vehicle travel will typically contain compacted soils. These soils will be de-compacted on a case-by-case basis through negotiation with the landowner or land management agency.	Yes
REC-22	Final Cleanup: Final cleanup will ensure that all construction areas are free of any construction debris including, but not limited to: assembly scrap metals, oil or other petroleum-based liquids, construction wood debris, and worker-generated litter. Permanent erosion control devices will be left in place.	Yes
REC-23	The Companies will utilize soil amendments (e.g., fertilizer, wood or straw mulches, tackifying agents, or soil stabilizing emulsions) on a case-by-case basis and with landowner or land management agency approval. Specific soil amendments will be identified in the Final Reclamation Plan and be consistent with the SWPPPs.	Yes
REC-24	Broadcast seeding will apply the seed directly on the ground surface. The type of broadcast spreader will depend on the size of the area to be seeded, and the terrain. Seed will be placed in direct contact with the soil, ideally at a depth of approximately 0.5 to 1-inch deep. It will then be covered by raking or dragging a chain or harrow over the seed bed to remove air pockets.	Yes
REC-25	Drill seeding will be used on areas of sufficient size with moderate or favorable terrain to accommodate mechanical equipment. Drill seeding provides the advantage of planting the seed at a uniform depth.	Yes
REC-26	Hydroseeding, which is the spraying of seeds and water onto the ground surface, or hydroseeding/hydromulching, which is the spraying of seeds, mulch and water, may be implemented on steeper slopes. Tackifier may be added to facilitate adherence of hydromulch to slopes greater than 25 percent.	Yes
REC-27	Reclamation treatments, such as seeding, will be based on site-specific conditions and the appropriate seed mix approved for those conditions. Seeding will help to reduce the spread of noxious weeds by revegetating exposed soils.	Yes
REC-28	If areas are not immediately seeded after construction, due to weather or scheduling constraints, all noxious weeds will be eradicated before seeding, preferably in the spring.	Yes
REC-29	Upon completion of construction, 70 percent of the disturbed area along the transmission line within the ROW, at substations, and at related facilities will be revegetated with approved vegetation (refer to Appendix D – Framework Reclamation Plan).	Yes

EPM Number	Environmental Protection Measures	Applicable to SRBOP
VEGETATION		
REC-2–17, 23–29	(Described under Reclamation)	Yes
WEED-6, 7, and 11	(Described under Weeds)	Yes
VEG-1	During construction, blading of native plant communities will be minimized, consistent with safe construction practices. Where feasible, shrubs will be cut at or near ground level to facilitate re-growth after construction. The footprint of construction and operations facilities will be kept to the minimum necessary. Blading near watercourses will be minimized and BMPs identified in the SWPPPs will be implemented to reduce the risk of materials entering watercourses.	Yes
VEG-2	Where feasible, locate new access roads to minimize the number of trees removed during construction. However, new access roads will not be relocated if the change would result in an increase in the overall disturbance (acres); require additional cut and fill activities, or impact other sensitive resources (e.g., sagebrush plant community, sensitive species habitat, and/or cultural resources or viewshed).	Yes
VEG-3	In areas where revegetation will be completed, topsoil salvage and replacement will be used for all cut or fill areas and for areas larger than 1 acre where soils will be disturbed during construction.	Yes
VEG-4	Prior to the start of construction and maintenance activities, all contractor vehicles and equipment (including personal protective equipment) will be cleaned of soil and debris capable of transporting invasive plant seeds or other propagules. All vehicles and equipment will be inspected by Agency-approved inspectors and certified as weed free by agency approved personnel, in order to ensure they have been cleaned properly. The Construction Contractor will identify the location of all cleaning stations, how materials cleaned from vehicles at these stations will be either captured or treated so that cleaning station locations will not become infected, and who will confirm/certify that vehicles leaving cleaning stations and/or entering construction sites are free of invasive plant materials in the Final Reclamation and Noxious Weed Plans.	Yes
VEG-5	The Agency-approved Environmental CIC will approve primary noxious weed-free straw or other erosion control materials on federally managed lands prior to application.	Yes
VEG-6	The Companies will consult with the appropriate land management agency to determine tree seedlings to be planted in decommissioned roadbeds and other temporarily disturbed areas on federally managed lands (where trees were removed) to assure seedlings are matched to site conditions.	Yes
VEG-7	The Companies will notify the USFS when topsoil salvage operations are scheduled and seek assistance with field identification of topsoil material.	No
VEG-8	Annual post-construction monitoring and treatment of invasive plants on closed roads (access roads dedicated for use by the Companies only), temporary roads, fly yards, and other disturbed areas in the ROW shall continue for 3 years in areas where infestations or populations of noxious weeds have been identified. If after 3 years, post-construction conditions are not equivalent to or better than preconstruction conditions (in accordance with applicable permit), monitoring and treatment will continue until these conditions are met. If adjacent land uses are contributing to the introduction and/or persistence of invasive plant species within areas disturbed by the Project, then the Companies will not be required to treat noxious weeds for more than 3 years.	Yes
VEG-9	The Companies will meet the terms and stipulations within the timber sale contracts for timber removal operations on the Medicine Bow-Routt, Caribou-Targhee, and Sawtooth NFs.	No
VEG-10	All timber and other vegetative resources to be sold or removed from federal lands will be appraised and sold at the appraised value. Note that this is an agency imposed measure.	Yes
TES-PLANTS		
OM-21–22 and 24–25	(Described under Operations and Maintenance.)	Yes
TESPL-1	Blowout Penstemon – Surface disturbance will be allowed in suitable habitat where species-specific surveys have determined that no populations are present. The species-specific surveys will be conducted the year prior to construction, and the proposed disturbance areas will be redesigned to avoid direct impact to populations.	No

EPM Number	Environmental Protection Measures	Applicable to SRBOP
TESPL-2	Colorado Butterfly Plant – Surface disturbance will be allowed in suitable habitat where species-specific surveys have determined that no populations are present. The species-specific surveys will be conducted the year prior to construction, and the proposed disturbance areas will be redesigned to avoid direct impact to populations.	No
TESPL-3	Qualified botanists shall conduct preconstruction surveys during a season when target species are readily identifiable for special status or globally rare species. Where feasible, micrositing of Project facilities shall avoid direct impacts to identified populations. Survey reports documenting the surveys, their results, and recommendations must be provided to the applicable land management agencies for approval prior to construction. Agency botanists may evaluate individual sites based on site-specific conditions. Documentation of the evaluation of avoidance of impacts to sensitive and globally rare plants must be provided to the Agencies prior to construction.	Yes
TESPL-4	Slickspot Peppergrass – Environmental monitors will survey for and mark slickspots and aboveground populations of slickspot peppergrass within 50 feet of the construction area prior to ground disturbance (including roads) in potential or occupied slickspot peppergrass habitat. No construction shall occur within 50 feet of any slickspot peppergrass plants or slickspots found by the environmental monitor. Also, construction shall not occur within 50 feet of previously known occupied slickspot peppergrass areas, based on Idaho CDC data, even if aboveground plants are not observed by the environmental monitor. Within proposed critical habitat, impacts to Primary Constituent Elements, such as native sagebrush/forb vegetation, will be avoided to the extent practicable. Seeding during reclamation in areas of suitable habitat will use methods that minimize soil disturbance such as no-till drills or rangeland drills with depth bands. Reclamation will use certified weed-free native seed. Excess soils will not be stored or spread on slickspots. Note that this species is not expected to occur in Segment D.	Yes
TESPL-5	Sand dune and cushion plant communities will be avoided, where feasible.	No
TESPL-6	Goose Creek Milkvetch – Surface disturbance will be allowed in suitable habitat for Goose Creek milkvetch where species-specific surveys have determined that no populations are present. The species-specific surveys will be conducted the year prior to construction, and the proposed disturbance areas will be redesigned to avoid direct impacts to populations. Note that this species is not expected to occur in Segment D.	No
TESPL-7	Ute Ladies'-tresses – Qualified botanists shall conduct preconstruction surveys during a season when target species are readily identifiable for special status or globally rare species. Where feasible, micrositing of project facilities shall avoid direct impacts to identified populations. Survey reports documenting the surveys, their results, and recommendations must be provided to the applicable land management agencies for approval prior to construction. Agency botanists may evaluate individual sites based on site-specific conditions. Documentation of the evaluation of avoidance of impacts to sensitive and globally rare plants must be provided to the Agencies prior to construction.	No
WEEDS		
REC-2–15, 17	(Described under Reclamation)	Yes
OM-13–15 and 20	(Described under Operations and Maintenance)	Yes
VEG-4 and 8	(Described under Vegetation)	Yes
FISH-3	(Described under Fish)	Yes
SOIL-11 and 12	(Described under Soils)	Yes
WEED-1	The Companies shall consult with each appropriate local land management agency (USFS and BLM) office to determine appropriate seed mix and commercial seed source for revegetation. The Final Reclamation Plan shall specify the approved seed mixes for federal lands. Disturbed soil will not be allowed to support the growth of noxious weeds or invasive weedy species. Prevention of noxious weeds will apply to all phases of the Project.	Yes
WEED-2	Weed control and prevention measures shall adhere to all agency standards and guidelines. These measures shall be developed in consultation with local, state, and federal weed agencies; all implemented measures will follow the principle of integrated weed management.	Yes
WEED-3	Soil stockpiles in areas containing noxious weeds and invasive plant species shall be kept separate from soil removed from areas that are free of noxious weed and invasive plant species, and the soil will be replaced in or near the original excavation. If requested by the applicable land management agency, soil	Yes

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	stockpiles shall be covered with plastic if the soil stockpile will be in place for two weeks or more and is not being actively used. On lands managed by the USFS or per private landowner request, stockpiles will not be covered with plastic.	
WEED-4	Gravel and other materials used for road construction on federally managed lands shall come from certified weed-free sources.	Yes
WEED-5	Where feasible, construction will begin in weed-free areas before operating in weed-infested areas. The feasibility of this measure will be determined after survey data is completed to identify weed-free and weed-infested areas.	Yes
WEED-6	All movement of construction vehicles outside of the ROW will be restricted to pre-designated access, contractor-acquired access, or public roads. All construction sites and access roads, including overland access routes, will be clearly marked or flagged at the outer limits prior to the onset of any surface-disturbing activity. All personnel shall be informed their activities must be confined within the marked or flagged areas.	Yes
WEED-7	Prior to arrival at the work site, all Construction Contractor vehicles and equipment will be cleaned using high-pressure air or water equipment. The cleaning activities will concentrate on tracks, feet, or tires and the undercarriage with special emphasis on axles, frame, cross members, motor mounts, underneath steps, running boards, and front bumper/brush guard assemblies. Vehicle cabs will be swept out. The locations of vehicle cleaning stations will be identified by the Construction Contractor. Additional wash stations will be required as identified by the BLM, USFS, and CIC. Wash stations shall be no more than one acre in size and preferably located in areas that have previously been disturbed. The Construction Contractor shall provide a detailed design identifying all of the components of the wash stations, including rock surface and geomembrane layer to provide a barrier between noxious weeds and seeds and the soil for approval by the BLM or USFS Authorized Officer or his/her designated representative. The Construction Contractor shall also provide a description of how residue from the wash station will be disposed of for approval by the BLM, BOR, or USFS Authorized Officer or his/her designated representative.	Yes
WEED-8	When moving from weed contaminated areas to other areas along the transmission line ROW, all construction vehicles and equipment will be cleaned using compressed water or air in designated wash stations before proceeding to new locations. All washing of construction vehicles and equipment must be performed in approved wash stations.	Yes
WEED-9	Construction personnel will inspect, remove, and appropriately dispose of weed seed and plant parts found on their clothing and equipment.	Yes
WEED-10	Immediately following construction, the Construction Contractor will implement the reclamation of disturbed land as outlined in Appendix D – Framework Reclamation Plan as required. Continuing revegetation efforts will ensure adequate vegetative cover, reducing the potential for the invasion of noxious weeds.	Yes
WEED-11	Discing or other mechanical treatments that would disturb the soil surface within native habitats will be avoided in favor of pesticide application, which is an effective means of reducing the size of noxious weed populations, as well as preventing the establishment of new colonies.	Yes
WEED-12	Implement preventive measures, such as quarantine and closure, to reduce and contain existing noxious weed populations. Flagging will alert personnel and prevent access into areas where noxious weeds occur. Construction disturbance will be minimized in these areas until control measures have been implemented (with the exception of reclamation treatments, as applicable).	Yes
WEED-13	If discing or tilling is an appropriate and feasible weed treatment method, it will only be permitted in bladed areas.	Yes
WEED-14	Seed selection will be based on site-specific conditions, and the appropriate seed mix will be identified for those conditions based on the presence and treatment of noxious weeds in the Project area. The CIC or weed specialist may recommend modified seeding application rates and timing of implementation to achieve site-specific weed management objectives.	Yes
WEED-15	Additional weed and/or erosion control measures recommended during monitoring will follow the preventive and control measures outlined in the Noxious Weed Plan. Continued cooperation with the current BLM, BOR, or USFS noxious weed coordinator and local weed management areas is also encouraged.	Yes
WEED-16	A certified pesticide applicator, approved in the states of Wyoming or Idaho, will perform the application using pesticides selected and approved by BLM or USFS in accordance with applicable laws, regulations, and permit stipulations. All pesticide applications must follow U.S. Environmental Protection Agency label instructions. Application of pesticides will be suspended in accordance with the Companies' vegetation management specifications (e.g., strong winds, etc.).	Yes
WEED-17	Pesticides will be transported to the Project site daily with the following provisions:	Yes

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	• Only the quantity needed for that day's work will be transported. • Concentrate will be transported only in approved containers in a manner that will prevent tipping or spilling, and in a location isolated from the vehicle's driving compartment, food, clothing, and safety equipment. • Mixing will be done offsite, over a drip catching device and at the following distances from open or flowing water, wetlands, or other sensitive resources: 100 feet for practically non-toxic to slightly toxic pesticides; 250 feet for moderately toxic or label advisory for ground/surface water; and 250 feet for highly toxic to very highly toxic pesticides. No pesticides will be applied at these areas unless authorized by appropriate regulatory agencies. • All pesticide equipment and containers will be inspected for leaks daily. • Disposal of spent containers will be in accordance with the pesticide label.	
WEED-18	Pesticide contractors will be state-certified to apply pesticides and will obtain, and have readily available, copies of the appropriate material safety data sheets for the pesticides used. All pesticide spills will be reported in accordance with applicable laws and requirements.	Yes
STREAMS and WETLANDS		
OM- 16-20	(Described under Operations and Maintenance)	Yes
VIS-6 and 8	(Described under Visual)	Yes
REC-1–22, and 29	(Described under Reclamation)	Yes
FISH-1 and 3	(Described under Fish)	Yes
WQA-1, 2, 4 – 6, 13 – 18, 21, 23 – 29, and 45 – 48	(Described under Water Quality)	Yes
TRANS-13, and 16 – 18	(Described under Transportation)	Yes
WET-1	Impacts on wetland and riparian areas will be avoided unless physically or economically infeasible or where activities are permitted. Land management agencies' plans (RMPs, MFPs, and Forest Plans) that have standards, guidelines, stipulations, or avoidance buffers will be adhered to. Where these do not exist, Inland Fish Strategy (INFISH) buffers will be followed.	Yes
WET-2	Wetland delineations will be performed prior to construction to support CWA Section 404 permitting and to minimize Project impacts. The delineation will identify both wetland and non-wetland waters of the United States that would be affected by the Project.	Yes
WET-3	Where impacts on wetlands are not avoidable, site-specific crossing plans and measures to mitigate impacts will be submitted to the appropriate regulatory agency, as well as the land-managing agency. The Companies and/or Construction Contractor will obtain all necessary permits prior to discharging dredged or fill material to waters of the U.S. and state.	Yes
WET-4	To meet USACE requirements for CWA 404 permitting, the Companies will submit a mitigation plan that is accepted by the USACE. The framework for this plan is included in the Final EIS.	Yes
WET-5	Limit construction equipment operating in streams and wetlands to that needed to clear temporary access, erect towers, pull conductor, and perform ground disturbing activities.	Yes
WET-6	Limit clearing of vegetation at the edges of a stream or wetland to the minimal area necessary for required conductor clearance and vehicle passage. Reclaim at least 70 percent of potential ground cover within 100 feet from the edges of all perennial streams, lakes, and other water bodies, or to the outer margin of the riparian ecosystem where wider than 100 feet.	Yes
WET-7	Salvage and respread topsoil in areas subject to temporary disturbance where grading and excavation will occur.	Yes
WET-8	Prohibit the use of imported soil, tree stumps, riprap, or brush to stabilize the construction corridor within wetlands.	Yes
FISH		
OM-16	(Described under Operation and Maintenance)	Yes
BLA-2	(Described under Public Safety)	Yes

EPM Number	Environmental Protection Measures	Applicable to SRBOP
FISH-1	On BLM-administered land, all culverts, whether temporary or permanent, must be designed to meet BLM Gold Book standards (Surface Operating Standards and Guidelines for Oil and Gas Exploration Development). On NFS lands, Forest Plan standards and guidelines shall apply.	Yes
FISH-2	When taking water from TES fish-bearing streams for road and facility construction and maintenance activities, intake hoses shall be screened with the most appropriate mesh size (generally 3/32 of an inch), or as determined through coordination with NMFS and/or USFWS.	Yes
FISH-3	All wetlands and waters in the project area are assumed to contain aquatic invasive species and all equipment contacting water will be properly disinfected. After work is complete in a waterbody, any equipment involved in construction in that waterbody must be washed to remove any propagules of aquatic invasive species and to prevent the spread of those species to other waterbodies.	Yes
WILDLIFE		
WILD-1	Requests for exceptions from closure periods and areas will be submitted by the Companies or the Construction Contractor per the Companies' direction to the appropriate BLM Field Office in which the exception is requested through the Environmental CIC. Established exception processes on BLM-managed lands will be followed. The agency, the CIC, or a contractor chosen by the Companies and approved by the agency, will conduct any surveys and coordinate with any other agencies as necessary. Factors considered in granting the exception include; animal conditions, climate and weather conditions, habitat conditions and availability, spatial considerations (e.g., travel routes and landscape connectivity), breeding activity levels, incubation or nestling stage, and timing, intensity, and duration of the Proposed action. Requests will be submitted in writing no more than 2 weeks prior to the proposed commencement of the construction period, to ensure that conditions during construction are consistent with those evaluated. The Authorized Officer, on a case-by-case basis, may grant exceptions to seasonal stipulations, and has the authority to cancel this exception at any time. A good faith effort will be made to act on exceptions within 5 business days of receiving a request, to allow for orderly construction mobilization. The CIC will conduct any required site visit and report the status to BLM for consideration of the decision to accept or deny the request. There is no exception process for NFS lands; all closure periods will be adhered to. Any proposed modifications to closure periods will be discussed on a case-by-case basis with the USFS.	Yes
WILD-2	Vehicular speeds during construction and operations will be limited to 25 mph on all unsurfaced access roads. Crew and vehicle travel will be restricted to designated routes while on state designated big game winter range (except for areas within the ROW).	Yes
WILD-3	The Project will be designed and constructed in compliance with Avian Power Line Interaction Committee (APLIC) guidance in order to reduce impacts to avian species. Any changes to the Project's design, as requested by federal, state, or local jurisdictions, as well as any changes considered by the Companies, will also be in compliance with APLIC guidance.	Yes
WILD-4	Preconstruction pedestrian or aerial nest surveys will be conducted in suitable habitat during the appropriate nesting time periods needed to identify new raptor nest locations, and to establish the status of previously identified raptor nests. Appropriate buffers will be applied to active nests during construction. All encounters of nesting raptors in the survey area will be reported to the biological monitor and to appropriate agencies.	Yes
WILD-5	Surveys will be conducted along the route across the Caribou-Targhee NF, prior to construction, for caves, abandoned mines, and adits. If suitable bat roosts are identified, the Companies will consult with the USFS to determine appropriate protective measures.	No
WILD-6	Guy wires will be marked with bird deterrent devices on federal lands to avoid avian collisions with structures, as directed by local land manager.	Yes
WILD-7	Flight diverters will be installed and maintained where the transmission line crosses rivers at the locations identified in Appendix H, Table 4-1.. Additional locations may be identified by the Agencies or the Companies. The flight diverters will be installed as directed in the Companies' approved Avian Protection Plans and in conformance with the MBTA and Eagle Acts as recommended in the current APLIC collision manual.	Yes
WILD-8	Preconstruction pedestrian or aerial surveys will be completed during appropriate nesting time periods, needed to identify each raptor species. The Companies will provide survey results to the Authorized Officer for approval. (See WILD-1)	Yes
WILD-9	To the extent feasible, all vegetation clearing will be conducted prior to the onset of the avian breeding season (generally April 15 through July 31, depending on local conditions and federal land management plan requirements) in order to minimize impacts to migratory birds. Where this is not feasible, preconstruction surveys within the disturbance footprint shall be conducted within seven days prior to clearing. If an active nest (containing eggs or young) of a bird species protected under the MBTA is found during either preconstruction surveys or construction activities, the nest will be identified to	Yes

EPM Number	Environmental Protection Measures	Applicable to SRBOP
	species, inconspicuously marked, and vegetation left in place until any young have fledged.	
WILD-10	Snags will be maintained along the outer portions of the Project's ROW in order to reduce the impacts to cavity nesting habitat to the extent practical and where not in conflict with the Companies' vegetation management specifications.	Yes
WILD-11	Any areas that may require blasting will be identified and a blasting plan will be submitted to the appropriate agency for approval. Blasting within 0.25 mile of a known sensitive wildlife resource will require review and approval by the appropriate agency.	Yes
WILD-12	The Companies will annually document the presence and location of large stick nests on any towers constructed as a result of this Project. Nests will be categorized to species or species group (raptors or ravens), to the extent possible. This will begin following the first year of construction and continue through year 10 of operations. Results will be provided annually to the applicable land management agency and to the USFWS. Note that this is an agency imposed measure.	Yes
	TES-WILDLIFE	
TESWL-1	H-frame structures will be equipped with anti-perch devices to reduce raven and raptor use, and limit predation opportunities on special status prey species on federally managed lands. Note that this is an agency imposed measure based on the Casper and Rawlins RMPs.	Yes
TESWL-2	In the event that an ESA-listed species not covered by the Biological Opinion (BO) is discovered during surveys, construction will cease, the USFWS will be notified, and Section 7 consultation will be initiated. In addition, the transmission line or structures will be relocated to minimize direct impacts to newly discovered ESA species, to the extent practical.	Yes
TESWL-3	Black-footed Ferret – Preconstruction surveys will be conducted for the black-tailed prairie dog (in addition to those already proposed for the white-tailed prairie dog) in Segment 1W.[1/]	No
TESWL-4	The Environmental CIC, an agency biologist, or agency designee will accompany the Construction Contractor site engineers during the final engineering design or prior to ground-disturbing activities to verify and flag the location of any known occupied structures (e.g., nests, burrows, colonies, dens) utilized by sensitive species. This will include, but not be limited to, artificial burrows that have been constructed as part of research/restoration efforts, prairie dog colonies, and raptor nests, which could be impacted by the Project based on the indicative engineering design. The final engineering design will be "microsited" (routed) to avoid direct impact to these occupied structures to the extent practical within engineering standards and constraints.	Yes
TESWL-5	Grouse Species – The Companies will provide the Agencies a list of the protocols that the Companies will use during greater sage-grouse and sharp-tailed grouse preconstruction surveys. The Agencies will either approve these protocols, or suggest alternative protocols to be used.	Yes
TESWL-6	Sharp-tailed Grouse – In areas where sharp-tailed grouse leks occur in proximity to greater sage-grouse leks, surface disturbance will be avoided within 4 miles of occupied or undetermined greater sage-grouse leks from March 1 to July 15. In areas where sharp-tailed grouse leks occur in isolation from greater sage-grouse leks, surface disturbance will be avoided within 1.2 miles of occupied or undetermined sharp-tailed grouse leks from March 15 to July 15.	No
TESWL-7	Yellow-billed cuckoo - A preconstruction survey for the yellow-billed cuckoo will be conducted at any proposed crossing of suitable habitat. If these birds are detected within 1 mile of the centerline (within existing habitat), construction will not occur until the young have fledged or the nest is abandoned. The crossing-specific plan will contain proposed monitoring measures to assure compliance with this measure.	Yes
TESWL-8	Sage-Grouse – On federal lands, there will be no surface occupancy (NSO) within 0.6 mile of the perimeter (or centroid if the perimeter has not been mapped) of occupied greater sage-grouse leks located within Core areas in Wyoming, and NSO within 0.25 mile in non-Core areas (as required by BLM IM WY-2012-19 and BLM land management plans). "No surface occupancy," as used here, means no new surface facilities, including roads, will be placed within the NSO area. Other activities (i.e., non-surface occupancy) may be authorized, with the application of appropriate seasonal stipulations, provided the resource's protected area is not adversely affected.	Yes
TESWL-9	Sage-Grouse – On federal lands, surface disturbance will be avoided within 4 miles of occupied or undetermined greater sage-grouse leks from March 1 to July 15. This distance (i.e., 4 miles) may be reduced on a case-by-case basis by the applicable agency, if site-specific conditions will allow the Project to be located closer to the lek than 4 miles (e.g., topography prevents the Project from being visible from the lek, or a major disturbance such as a freeway or existing transmission line is located between the Project and the lek).	Yes

EPM Number	Environmental Protection Measures	Applicable to SRBOP
TESWL-10	Sage-Grouse – If Winter Concentration Areas for the greater sage-grouse are designated, there will be no surface disturbances within the designated areas from November 1 through March 15.	Yes
TESWL-11	Sage-Grouse – No structures that require guy wires will be used in occupied sagebrush obligate habitats within the area managed under the Kemmerer RMP.	No
TESWL-12	Colorado River T&E Fishes – A payment of a one-time fee, based on a fee schedule provided by the USFWS, will be made based on the amount of water used during construction of any segments that cross the Colorado River system.	No
TESWL-13	Midget faded rattlesnake – Preconstruction surveys for occupied or potential midget faded rattlesnake hibernacula (i.e., rock outcrops with south to east aspect) will be conducted. The Companies shall prepare a plan identifying measures to reduce impacts to midget faded rattlesnake if they are discovered. This plan shall require approval by BLM and the WGFD prior to its implementation	No
TESWL-14	For the protection of aquatic and riparian/wetland dependent species, surface disturbing and disruptive activities will be avoided in the following areas: 1) identified 100-year floodplains; 2) areas within 500 feet of perennial waters, springs, wells, and wetlands; and 3) areas within 100 feet of the inner gorge of ephemeral channels on federally managed lands. Where it is not possible to avoid wetland and riparian habitat, crossing-specific plans will be developed. These plans will: 1) demonstrate that vegetation removal is minimized; 2) show how sediment will be controlled during construction and operation within wetland and riparian areas; 3) attempt to intersect the wetland or riparian habitat at its edge; and 4) provide measures to restore habitat and ensure conservation of riparian microclimates. This plan will be submitted to the appropriate land management agency and approved prior to construction of any portion of the Project within sensitive riparian habitat. Note that this is an agency imposed measure.	Yes
TESWL-15	Anti-perch devices will be required on power poles located within one-quarter mile of prairie dog towns within the BLM's Rawlins Field Office. Note that this is an agency imposed measure.	No
TESWL-16	Sage-Grouse – If the Kemmerer RMP is amended to allow Proposed Route 4 or Alternatives 4C or 4E to be selected, existing fences within 1 mile of the portion of the Gateway West Project located on lands managed by the Kemmerer RMP will be modified with FireFly Grouse Flight diverters (or a similar product) in order to prevent greater sage-grouse mortalities. Additional site-specific reclamation, such as transplanting sagebrush seedlings within previous disturbed habitats, will also be required to off-set the net loss of sagebrush habitats within the Rock Creek/Tunp management area. Note that this is an agency imposed measure.	No
PALEONTOLOGICAL RESOURCES		
PALEO-1	If significant fossil materials are discovered during Project construction, all surface-disturbing activities in the vicinity of the find will cease until notification to proceed is given by the Authorized Officer. The site will be protected to reduce the risk of damage to fossils and context. Appropriate measures to mitigate adverse effects to significant paleontological resources will be determined by the Authorized Officer.	Yes
PALEO-2	Paleontological resources (as defined by omnibus Public Land Management Act – Paleontological Resources Preservation Section) on federally managed land shall be managed and protected using scientific principles and expertise. Appropriate plans for inventory, monitoring, and the scientific and educational use of these resources shall be developed in accordance with applicable agency laws, regulations and policies.	Yes
PALEO-3	Where fossil-bearing sediments are exposed by construction, the sediments must be covered with a 4-inch layer of soil where feasible to reduce unauthorized removal or disturbance of resources.	Yes
PALEO-4	To ensure compliance with the Paleontological Resources Preservation Section of the Public Land Management Act, the Companies' Paleontological Resources Protection Plan for the Project (see PALEO-2) shall specify that: • Monitoring of excavation and grading in sensitive sediments, especially access roads and tower sites, must occur when construction is near or in those geologic formations. • Monitoring of excavations in sensitive sediments, screening the excavated spoils, and processing of bulk sediment samples for microinvertebrate fossils must occur where there is a significant potential for data recovery from those spoils. Monitoring must be performed by a qualified paleontologist and in consultation with a designated paleontologist in each state, NF, or BLM district. The Authorized Officer will designate the appropriate paleontologist depending on project location.	Yes

EPM Number	Environmental Protection Measures	Applicable to SRBOP
	Note that this is an agency imposed measure.	
PALEO-5	Field surveys will be completed prior to surface disturbance in areas with potential fossil yields of Class 3, 4, or 5, in accordance with criteria stated in the Paleontological Resources Protection Plan and as required by the land management agency. Note that this is an agency imposed measure.	Yes
GEOLOGIC HAZARDS		
BLA-1, 2	(See description under Public Safety)	Yes
GEO-1	Review the final location of the preferred alternative with affected mine operators and lessees to ensure all measures are taken to protect against subsidence.	Yes
GEO-2	A site-specific soil analysis shall be conducted prior to construction to verify any areas identified as unstable or marginally unstable on federal lands. A site-specific geotechnical analysis shall be conducted of federal lands prior to construction to locate areas where there is landslide risk. If such areas are identified, the Companies will develop mitigation and submit a report to the appropriate land management agency.	Yes
SOILS		
WQA-1–17	(Described under Water Quality)	Yes
SOIL-1	The Wyoming BLM State Reclamation Policy and applicable Agency management plan requirements for soil management will be followed on federal lands in the state of Wyoming.	No
SOIL-2	The Companies will submit a Compaction Monitoring Plan for review and Agency approval prior to construction that specifies the conditions under which construction will either not start or will be shut down due to excessively wet soils. Conditions will be measurable in the field and easy to demonstrate to construction workers.	Yes
SOIL-3	During decommissioning, some obviously compacted areas, such as established newly constructed access roads, will require loosening prior to revegetation. If necessary to re-establish vegetation, the Companies will use a ripper blade, till, or similar instrument to loosen the surface soil layer.	Yes
SOIL-4	Detrimental soil disturbance such as compaction, erosion, puddling, and displacement will be minimized through implementing measures identified in the SWPPP. Measures may include road ripping, frequent waterbars, cross-ditching (e.g., rolling dips) or other methods to reduce compaction while preventing gully formation. Ripping pattern should be altered to a crossing, diagonal, or undulating pattern of tine paths to avoid concentrated runoff patterns that can lead to gullies.	Yes
SOIL-5	The Companies are responsible for monitoring to ensure soil protection is achieved, and providing a monitoring report on reseeding success and/or other methods to stabilize soils to the USFS by the end of each growing season for areas on NFS lands for 3 years or until requirements are met for the applicable permit.	No
SOIL-6	Reclamation of all temporary disturbances on NFS lands (such as road cuts) should include replacement of material to original contours and re-compaction to pre-disturbance compaction percentage (which should be identified during reclamation at adjacent locations to the disturbance). Guidelines for streambank re-compaction to maximize vegetative regrowth and mechanical stability are covered in USACE publication ERDC TN-EMRRP-SR-26.	No
SOIL-7	In order to meet Forest Plan Soil Standards on NFS lands, the Reclamation Plan (approved by the USFS) will describe on-site restoration using topsoil salvaging.	No
SOIL-8	When feasible, reroute all construction or maintenance activities around wet areas so long as the route does not cross into sensitive resource areas and at the approval of the CIC.	Yes
SOIL-9	Limit access of construction equipment to the minimum area feasible, remove and separate topsoil in wet or saturated areas subject to temporary disturbance, and stabilize subsurface soils with a combination of one or more of the following: perform grading to dewater problem areas, utilize weight dispersion mats, and maintain erosion control measures such as surface drilling and back-dragging. After construction is complete, regrade and recontour the area, replace topsoil, and reseed to achieve the success standard desirable plant covers as stated in the Reclamation Plan.	Yes
SOIL-10	Vegetation removal and soil disturbances (including temporary road improvements) will be minimized in areas where soil constraints occur. In areas of overland construction, where vegetation removal is required, mowing or cutting and/or back-dragging a cat blade will be the primary method used (also refer to Appendix D –Framework Reclamation Plan).	Yes
SOIL-11	Prior to construction, soils will be evaluated to determine if they are expansive and if they may have potential effects on the proposed facilities. Where they represent a potential hazard, solutions recommended by the Project's geotechnical engineer, such as excavation and replacement of the	Yes

EPM Number	Environmental Protection Measures	Applicable to SRBOP
	expansive soils with compacted backfill, will be required. If imported backfill material is used, it must be from a BLM/USFS-approved source and certified as free of invasive weeds and propagules (i.e., seeds and root fragments).	
SOIL-12	Limit disturbance of soils and vegetation removal to the minimum area necessary for access and construction.	Yes
SOIL-13	Inform all construction personnel, before they are allowed to work on the Project, of environmental concerns, pertinent laws and regulations, and elements of the erosion control plan.	Yes
SOIL-14	Slope and berm graded material, where possible, to reduce surface water flows across the graded area.	Yes
SOIL-15	Replace excavated materials in disturbed areas and minimize the time between excavation and backfilling.	Yes
SOIL-16	Direct the dewatering of excavations onto stable surfaces to avoid soil erosion.	Yes
SOIL-17	Re-establish native vegetation cover in highly erodible areas as quickly as possible following construction where determined necessary (refer to Appendix D –Framework Reclamation Plan).	Yes
SOIL-18	Construction water and water used for dust control will come from permitted sources identified by the Construction Contractor and a map showing the locations of these sources will be provided to the CIC. If the quality of the water is found to be causing any environmental changes (i.e., dying vegetation, excessively hard crusting of soils), the Construction Contractor will test the quality of the water and provide the results to the BLM for review.	Yes
SOIL-19	All Project personnel will be educated on dust control procedures.	Yes
SOIL-20	To prevent accelerated wind or water erosion on dirt roads, gravel mulches may be added if other mitigation measures are not adequate or if the area is not in a sensitive receptor zone. Gravel of approximately 0.75 to 1.5 inches in diameter should be used and cover a minimum of 90 percent of the soil surface. Slopes steeper than 3:1 may require additional sediment and erosion control structures.	Yes
SOIL-21	Surface roughening aids establishment of vegetative cover, reduces runoff velocities, increases infiltration, and reduces erosion by providing sediment trapping. Graded areas with smooth surfaces increase the potential for accelerated erosion; therefore, surfaces should be left in a roughened condition whenever possible.	Yes
SOIL-22	On steep slopes (greater than 30 percent) or in areas of concentrated flows (e.g., waterways) erosion control matting or riprap may be used to stabilize the surface and increase infiltration times.	Yes
SOIL-23	Areas graveled for stabilization will be inspected to ensure depressions caused by vehicle traffic are filled and runoff is not being directed toward wetlands or other receiving waters.	Yes
SOIL-24	Roughened surfaces should be periodically inspected for rills and washes. Areas exhibiting accelerated erosion will be filled and reseeded as necessary or determined by the BLM or USFS Authorized Officer or his/her designated representative.	Yes
SOIL-25	Construction, operation, and maintenance activities will be restricted when the soil is too wet to adequately support construction or maintenance equipment (i.e., when heavy equipment creates ruts in excess of 4 inches deep, over a distance of 50 feet or more in wet or saturated soils). This standard will not apply in areas with fine-grained soils, which easily form depressions even in dry weather.	Yes
WATER QUALITY		
WET-3	(Described under Streams and Wetlands)	Yes
FISH-1	(Described under Fish)	Yes
SOIL-9, 10, and 12-25	(Described under Soils)	Yes
WQA-1	The appropriate NPDES permits for construction activities that disturb one acre or more of land will be obtained from the Department of Environmental Quality and USEPA or their designees.	Yes
WQA-2	NPDES permit requirements will be met. This includes implementing and maintaining appropriate BMPs for minimizing impacts to surface water.	Yes
WQA-3	One or more responsible persons will be designated to manage stormwater issues, conduct the required stormwater inspections, and maintain the appropriate records to document compliance with the terms of the NPDES permit.	Yes
WQA-4	The SWPPPs will be modified as necessary to account for changing construction conditions.	Yes
WQA-5	The SWPPPs will identify areas with critical erosion conditions that may require special construction activities or additional industry standards to minimize soil erosion.	Yes
WQA-6	Stormwater BMPs will be inspected and maintained on all disturbed lands during construction activities, as described in the SWPPP and appropriate NPDES permit.	Yes
WQA-7	Approved sediment and erosion control BMPs will be installed and maintained until disturbed areas meet final stabilization criteria.	Yes

EPM Number	Environmental Protection Measures	Applicable to SRBOP
WQA-8	Temporary BMPs will be used to control erosion and sediment at multi-purpose areas (equipment storage yards, fly yards, lay down areas) and substations.	Yes
WQA-9	The construction schedule may be modified to minimize construction activities in rain-soaked or muddy conditions.	Yes
WQA-10	Damaged temporary erosion and sediment control structures will be repaired in accordance with the SWPPP and appropriate NPDES permit.	Yes
WQA-11	Upon completion of construction, permanent erosion and sediment BMPs will be installed along the transmission line within the ROW, at substations, and at related facilities in accordance with the SWPPPs and appropriate NPDES permit.	Yes
WQA-12	In areas of droughty soils, the soil surfaces will be mulched and stabilized to minimize wind erosion and to conserve soil moisture in accordance with the SWPPPs.	Yes
WQA-13	Construction industry standard practices and BMPs will be used for spill prevention and containment.	Yes
WQA-14	Construction spills will be promptly cleaned up and contaminated materials hauled to a disposal site that meets local jurisdictional requirements.	Yes
WQA-15	All multi-purpose areas and fly yards will contain fueling areas with containment of a minimum of 110 percent capacity of the largest vehicle to be refueled therein. Fueling of vehicles will take place within the transmission line ROW under the guidance of the ROW grant/special-use authorization. The SPCC plan will specify BMPs.	Yes
WQA-16	If an upland spill occurs during construction, berms will be constructed with available equipment to physically contain the spill and prevent migration of hazardous materials toward waterways. Absorbent materials will be applied to the spill area. Dry materials will not be cleaned up with water or buried. Contaminated soils and other materials will be excavated and temporarily placed on and covered by plastic sheeting, or suitable containers, in a containment area a minimum of 100 feet away from any wetland or waterbody, until proper disposal is arranged in appropriately designated and approved areas off-site.	Yes
WQA-17	If a spill occurs which is beyond the capability of on-site equipment and personnel, an Emergency Response Contractor will be identified and available to further contain and clean up the spill.	Yes
WQA-18	For spills in standing water or where spilled materials reach water, floating booms, skimmer pumps, and holding tanks will be used as appropriate by the contractor to recover and contain released materials on the surface of the water. Other actions will be taken, as necessary, to clean up contaminated waters.	Yes
WQA-19	If pre-existing contamination is encountered during operations, work will be suspended in the area of the suspected contamination until the type and extent of the contamination is determined. The type and extent of contamination; the responsible party; and local, state, and federal regulations will determine the appropriate cleanup method(s) for these areas.	Yes
WQA-20	The SPCC Plan will include details on the types and quantities of absorbent and protective materials (e.g., visqueen, booms) that must be readily available to construction personnel and requirements for the restocking of materials.	Yes
WQA-21	Storage of materials such as fuels, other petroleum products, chemicals, and hazardous materials including wastes will be located in upland areas at least 500 feet away from streams, 400 feet for public wells, and 200 feet from private wells.	Yes
WQA-22	Pumps and temporary fuel tanks for the pumps will be stored in secondary containment. Containment will provide a minimum volume equal to 110 percent of the volume of the largest storage vessel located in the yard.	Yes
WQA-23	Avoid placement of road bed material in channels (perennial, intermittent or ephemeral). Road bed material contains considerable fines that would create sedimentation in coarse cobble dominated stream channels. Even in seasonally dry reaches those fines could be transported during flow periods and negatively impact fish spawning reaches below.	Yes
WQA-24	On federal lands, consult with appropriate land management agency staff prior to siting and design for stream crossings (location, alignment, and approach for culvert, drive-through, and ford crossings). This may include a hydrologist, engineer and, for perennial and many intermittent streams, an aquatic biologist.	Yes
WQA-25	All culverts on NFS lands, both permanent and temporary, shall be designed and installed to meet desired conditions for riparian and aquatic species as identified in the applicable Forest Plan. Culverts should not be hydraulically controlled. Hydraulically controlled culverts create passage problems for aquatic organisms. Culvert slope should not exceed stream gradient and should be designed and implemented (typically by partial burial in the streambed) to maintain streambed material in the culvert.	No
WQA-26	Culvert sizing on NFS lands should also comply with Guidance for Aquatic Species Passage Design, USFS Northern Region & Intermountain Region.	No
WQA-27	On non-federal lands, culvert placement should comply with state BMPs.	Yes

EPM Number	Environmental Protection Measures	Applicable to SRBOP
WQA-28	Migration of construction-related sediment to all adjacent surface waterbodies will be prevented.	Yes
WQA-29	If the Project proposes to obtain water from wells or surface water sources to suppress dust, written approval from the landowner or regulatory agency will be obtained prior to appropriation.	Yes
WQA-30	In the event of a spill, cleanup will be immediate. The Construction Contractor will keep spill kits in their vehicles to allow for quick and effective response to spills. Items to be included in the spill kit at a minimum are: • Protective clothing and gloves • Absorptive clay, "kitty litter," or other commercial absorbents • Plastic bags and a bucket • Shovel • Fiber brush and screw-in handle • Dust pan • Caution tape • Highway flares (use on established roads only) • Detergent	Yes
WQA-31	The response to a hazardous material spill will vary with the size and location of the spill, but general procedures include: • CIC and BLM, BOR, or USFS notification • Traffic control • Dressing the cleanup team in protective clothing • Stopping any leaks • Containing spilled material • Cleaning up and removing spilled pesticide and contaminated absorptive material and soil • Transporting spilled pesticide and contaminated material to an authorized disposal site	Yes
WQA-32	Physical response actions are intended to ensure all spills are immediately and thoroughly contained and cleaned up. However, the first priority in responding to any spill is personal and public safety. Construction personnel will be notified of evacuation procedures to be used in the event of a spill emergency, including evacuation routes. In general, the first person on the scene will: • Attempt to identify the source, composition, and hazard of the spill. • Notify appropriately trained personnel immediately. • Isolate and stop the spill, if possible, and begin cleanup (if it is safe). • Initiate evacuation of the area, if necessary. • Initiate reporting actions.	Yes
WQA-33	Persons should only attempt to cleanup or control a spill if they have received proper training and possess the appropriate protective clothing and cleanup materials. Untrained individuals should notify the appropriate response personnel. In addition to these general measures, persons responding to spills will consult Appendix P – Framework Hazardous Materials Management Plan, Appendix R – Operations, Maintenance, and Emergency Response Plan, and the MSDSs or USDOT Emergency Response Guidebook (to be maintained by the Construction Contractor onsite during all construction activities), which outlines physical response guides for hazardous materials spills.	Yes
WQA-34	In general, expert advice will be sought to properly cleanup major spills. After contaminated soil is recovered, all machinery used will be decontaminated, and recovered soil will be treated as hazardous waste. Contaminated cleanup materials (absorbent pads, etc.) and vegetation will be disposed of in a similar manner. For spills, cleanup may be verified by sampling and laboratory analysis at the discretion of the Companies.	Yes
WQA-35	If construction activity occurs within a wetland with standing water or a flowing stream, prior to construction, absorbent booms will be placed on the water surface either around or downstream of the construction zone. In addition to this measure, cleanup materials, including absorbent spill pads and plastic bags, will be placed onsite at flowing streams and "wet" wetlands when construction is occurring within 200 feet of these areas (also refer to Appendix F –Framework Stormwater Pollution Prevention Plan).	Yes
WQA-36	Emergency spill response kits will be maintained at all locations where hazardous materials are stored, in sufficient quantities based on the amount of materials stored onsite. Spill response equipment should be compatible with types of materials stored onsite. Spill response equipment should be inventoried regularly to ensure spill response equipment is adequate for the type and quantities of materials being used. The following equipment, are examples of spill response equipment for use in cleanup situations: • Shovels • Absorbent pads/materials	Yes

EPM Number	Environmental Protection Measures	Applicable to SRBOP
	• Personal protective gear • Medical first-aid supplies • Bung wrench (nonsparking) • Phone list with emergency contact numbers • Storage containers • Communications equipment	
WQA-37	The Construction Contractor and subcontractors shall provide spill prevention and response training to appropriate construction personnel. Persons accountable for carrying out spill response activities will be designated prior to construction and informed of their specific duties and responsibilities with respect to environmental compliance and hazardous materials. The training shall inform appropriate personnel of site-specific environmental compliance procedures. Training of personnel should be completed at least once a year. All training events should be documented, including the date and names of those personnel in attendance. These records shall be maintained with the SPCC Plan and/or Hazardous Materials Management Plan. At a minimum, this training shall include the following: • An overview of regulatory requirements • Methods for the safe handling/storage of hazardous materials • Spill prevention procedures • Emergency response procedures • Use of personal protective equipment • Use of spill cleanup equipment • Procedures for coordinating with emergency response teams • Procedures for notifying agencies • Procedures for documenting spills • Identification of sites/areas requiring special treatment, if any	Yes
WQA-38	Notification and documentation procedures for spills that occur during Project construction, operation, or maintenance will conform to applicable federal, state, and local laws and regulations. Adherence to such procedures will be the top priority once initial safety and spill response actions have been taken.	Yes
WQA-39	Notification will begin as soon as possible after discovery of a spill. The individual who discovers the spill will contact the Contractor's supervisory personnel and the CIC. If the Construction Contractor determines the spill may seriously threaten human health or the environment, he/she will orally report the discharge as soon as possible, but no later than 24 hours from the time they become aware of the circumstances, as directed below. A written report must be submitted to Wyoming or Idaho Department of Environmental Quality (DEQ) within 15 days. Prior to initiating notification, the Construction Contractor (or individual initiating notification) should obtain as much information as possible, including: • current threats to human health and safety, include known injuries, if any • spill location, including landmarks and nearest access route • reporter's name and phone number • time spill occurred • type and estimated amount of hazardous materials involved • potential threat to property and environmental resources, especially streams and waterways • status of response actions	Yes
WQA-40	The following mandatory notifications will be made by the Construction Contractor. These numbers should be documented in the SPCC plan, along with the contact information for the cleanup contractor. Select and notify the appropriate government agencies based on geographic location of the spill site. • Wyoming DEQ (24 hours) at (307) 777-7781. • Idaho Communication Center (24 hours) at (800) 632-8000 or (208) 846-7610. • If spill threatens human health, call 911, and the appropriate county response center. • National Response Center (NRC) (800) 424-8802. The NRC should be notified of a reportable spill as required by 40 CFR 110, 40 CFR 117, and/or 49 CFR 171. The Construction Contractor will verify and update these emergency phone numbers before and during construction. The Construction Contractor (or other person in charge) will notify the CIC of all spills or potential spills within construction areas.	Yes
WQA-41	When a spill poses a direct and immediate threat to health and safety and/or property, the land management agency and landowners potentially affected by a spill will be notified directly by the Construction Contractor. Immediate notification of land management agencies and landowners is required for all situations in which the spill poses a direct and immediate threat to health and safety and/or property. Failure to report a spill could result in substantial penalties and fines.	Yes

EPM Number	Environmental Protection Measures	Applicable to SRBOP
WQA-42	The Construction Contractor will maintain records for all spills. State and federal agencies that have been verbally notified of a spill will be informed in writing within 10 days for state agencies and 30 days for federal agencies.	Yes
WQA-43	The Construction Contractor shall record spill information in a daily log. The following is a list of items that should be included in the daily log (as appropriate, based on the spill incident): • time and date of each log entry • name of individual recording log entry • list of all agencies notified, including name of individual notified, time, and date • type and amount of material spill • resources affected by spill • list of response actions taken, including relative success • copies of letters, permits, or other communications received from government agencies throughout the duration of the spill • copies of all outgoing correspondence related to the spill • photographs of the response effort (and surrounding baseline photographs if relevant)	Yes
WQA-44	During the Project's operation and maintenance phase, the Companies will ensure its facilities, personnel, and contractors comply with federal, state, and local laws and regulations pertaining to the use, storage, transport, and disposal of hazardous materials and adhere to required emergency response and cleanup procedures in the event of a hazardous material spill. The Companies and all operations and maintenance subcontractors shall develop hazardous materials management and response plans and properly train employees for handling, packaging, and shipping hazardous materials and responding to hazardous materials spills or emergency events.	Yes
WQA-45	Reclaim stream channels/bottoms and wetlands to their approximate preconstruction configuration/contours, unless the original stream bank contours are excessively steep and/or unstable and a more stable final contour can be specified or where permanent stream crossings must be created to maintain access throughout the life of the Project.	Yes
WQA-46	Stabilize stream banks, wetlands, and adjacent upland areas by establishing permanent erosion control measures and vegetation cover after the completion of construction (refer to Appendix N – Framework Erosion, Dust Control, and Air Quality Plan and Appendix D – Framework Reclamation Plan).	Yes
WQA-47	Use permanent waterbars, if needed, on slopes above streams or wetland boundaries, on travel routes, and along the ROW to minimize sediment flow from adjacent uplands into the stream or wetland.	Yes
WQA-48	Remove all prefabricated equipment pads, swamp mats, and geotextile fabric used for stream and wetland crossings on completion of construction.	Yes
LAND USE		
TRANS-5	(See description under Transportation)	Yes
LU-1	Signs shall be posted at access points to access roads where public access is restricted by a land use plan, and on private, state, and Tribal lands at the request of the landowner, agency, or Tribal government. Signs shall indicate the restriction or regulation, location, penalty for violation, and appropriate contact information for reporting violations. Signage shall be maintained and replaced as part of the routine maintenance.	Yes
AGRICULTURE		
AGRI-1	Consult with the Farm Service Agency and landowners to determine how construction may affect the CRP status of the land currently enrolled in CRP.	No
TRANSPORTATION		
FIRE-6	(See description in Public Safety (Blasting, Fire, Contamination)	Yes
TRANS-1	A Final Traffic and Transportation Management Plan will be developed and implemented to provide site-specific details showing how the Project will comply with the EPMs listed in this attachment. The Final Traffic and Transportation Management Plan will be submitted to, and approved by, the appropriate federal, state, and local agencies with authority to regulate use of public roads, and approved prior to the issuance of a Notice to Proceed with construction.	Yes
TRANS-2	If a construction method requires the closure of a state- or county-maintained road for more than 1 hour, a plan will be developed to accommodate traffic as required by a county or state permit.	Yes
TRANS-3	On county- and state-maintained roads, caution signs will be posted on roads, where appropriate, to alert motorists of construction and warn them of slow traffic. Traffic control measures such as traffic control personnel, warning signs, lights, and barriers will be used during construction to ensure safety and to minimize traffic congestion.	Yes
TRANS-4	To reduce traffic congestion and roadside parking hazards, an equipment yard will be provided for primary parking for employee personal vehicles.	Yes

EPM Number	Environmental Protection Measures	Applicable to SRBOP
TRANS-5	Unauthorized vehicles will not be allowed within the construction ROW or along roadsides near the ROW.	Yes
TRANS-6	Construction vehicles will follow a 25 mph speed limit on unposted project roads.	Yes
TRANS-7	Landowners will be notified at least 48 hours prior to the start of construction within 0.25 mile of a residence.	Yes
TRANS-8	Emergency vehicle access to private property will be maintained.	Yes
TRANS-9	Roads in residential areas will be restored as soon as possible, and construction areas near residences will be fenced off at the end of the construction day, without blocking residential traffic.	Yes
TRANS-10	Roads negatively affected by construction and as identified by the applicable jurisdictional agency and/or landowner will be returned to preconstruction condition. The method of preconstruction condition documentation will be coordinated by the Construction Contractor and the applicable jurisdictional agency and/or landowner.	Yes
TRANS-11	Roads developed specifically for this project that are identified by the Companies as no longer necessary will be reclaimed as specified in the Final Reclamation Plan. Culverts will be removed.	Yes
TRANS-12	The Companies will attempt to identify existing two-track trails as preferred access roads for construction when existing maintained (e.g., gravel or asphalt) roads are not available.	Yes
TRANS-13	Roads will be designed so proper drainage is not impaired and roads will be built to minimize soil erosion. Consult with appropriate Agencies during the design stage.	Yes
TRANS-14	Access roads built for the Project on federal lands shall be closed to the public unless otherwise agreed upon with the land management agency. Signs shall indicate the restriction or regulation, location, penalty for violation, and appropriate contact information for reporting violations. Signage and road closure measures shall be evaluated during routine visits and maintained or replaced as necessary as part of routine maintenance. Access roads constructed solely for use by the Companies will be maintained by the Companies as needed for the Companies' use in accordance with the ROW grants/special use authorization.	Yes
TRANS-15	Roads to be abandoned may be left intact through mutual agreement of the land management agency, landowner, the tenant, and the Companies, unless located in flood areas or drainage hazard areas or otherwise restricted by federal, state, or local regulations.	Yes
TRANS-16	All temporary culverts and associated fill material will be removed from stream crossings after construction. All permanent culverts will be engineered by the Construction Contractor and approved by the Companies prior to installation.	Yes
TRANS-17	The road or highway within the ROW corridor shall be used to the maximum extent possible for construction and maintenance of the new ROW.	Yes
TRANS-18	To help set public expectations for when temporary access roads are decommissioned, signs shall be posted on all temporary roads and overland access routes identifying them as reclamation areas. Signs will state "Restoration in Progress – No Vehicle Traffic Allowed."	Yes
TRANS-19	During wet road conditions, any ruts deeper than 4 inches remaining on the roads from the Project will be repaired.	Yes
AIR QUALITY		
FISH-3	(Described under Fish)	Yes
TESWL-12	(Described under TES-Wildlife)	Yes
SOIL-18 and 19	(Described under Soils)	Yes
AIR-1	Minimize idling time for diesel equipment whenever possible.	Yes
AIR-2	Ensure that diesel-powered construction equipment is properly tuned and maintained, and shut off when not in direct use.	Yes
AIR-3	Prohibit engine tampering to increase horsepower.	Yes
AIR-4	Reduce construction-related trips as feasible for workers and equipment, including trucks.	Yes
AIR-5	Dust suppression techniques will be applied, such as watering construction areas or removing dirt tracked onto a paved road as necessary to prevent safety hazards or nuisances on access roads and in construction zones near residential and commercial areas and along major highways and interstates.	Yes
ELECTRICAL ENVIRONMENT		
EE-1	During final design, limit the conductor surface gradient in order to meet the IEEE Radio Noise Guideline.	Yes
EE-2	During construction, identify objects such as fences, metal buildings, pipelines, and other metal objects within or near the proposed ROW that have the possibility for induced potentials and currents and implement electrical grounding of these objects according to the utility's and National Electric Code	Yes

EPM Number	Environmental Protection Measures	Applicable to SRBOP
	standards.	
EE-3	During final design and construction, identify areas where large equipment is anticipated and provide sufficient conductor clearance to ground to meet the NESC 5 mA rule or limit size or access of large equipment.	Yes
PUBLIC SAFETY (Blasting, Fire, Contamination)		
WQA-13 - 20	(Described under Water Quality)	Yes
WEED-24, 25	(Described under Weeds)	Yes
WILD-11	(Described under Wildlife)	Yes
BLA-1	The Blasting Plan will identify blasting procedures including safety, use, storage, and transportation of explosives that will be employed where blasting is needed, and will specify the locations of needed blasting.	Yes
BLA-2	All blasting will be performed by registered licensed blasters who will be required to secure all necessary permits and comply with regulatory requirements in connection with the transportation, storage, and use of explosives, and blast vibration limits for nearby structures, utilities, wildlife, and fish (where blasting is conducted in waterbodies).	Yes
BLA-3	Appropriate flags, barricades, and warning signals will be used to ensure safety during blasting operations. Blast mats will be used when needed to prevent damage and injury from fly rock.	Yes
BLA-4	Blasting in the vicinity of pipelines will be coordinated with the pipeline operator, and will follow operator-specific procedures, as necessary.	Yes
BLA-5	Damages that result from blasting will be repaired or the owner fairly compensated.	Yes
BLA-6	Proper blasting techniques, including proper cover of charges, will be followed.	Yes
BLA-7	Matting will be used in rock blasting operations to minimize and control dust.	Yes
BLA-8	Notification of blasting activities will be provided to nearby residents.	Yes
BLA-9	The Construction Contractor will prepare site specific blasting plans.	Yes
BLA-10	The Blasting Plan for the proposed Project will also stipulate the following: • Explosives will not be stored on federal land without prior written permission from the land-management agency. Copies of this permission will be posted on each magazine. • Seventy-two hours advance notice of blasting activities will be given to the land-management agency, railroads, highway departments, and local communities; occupants of nearby residences, buildings, and businesses; and local farmers. • Warning signs will be erected and maintained at all approaches to the blast areas and flaggers will be stationed on all roadways passing within 1,000 feet of blasting activities. • Explosives will not be primed or fused until just before use. • Blasting will take place during daylight hours only and will be monitored with three axis seismographs to ensure safe vibration levels are not exceeded. • Vibration measured as peak particle velocity will not exceed 4 inches per second adjacent to an underground pipeline and 2 inches per second for any aboveground structure (including water wells).	Yes
FIRE-1	Train all personnel about the measures to take in the event of a fire including; fire dangers, locations of extinguishers and equipment, emergency response, and individual responsibilities for fire prevention and suppression.	Yes
FIRE-2	Equip all construction equipment operating with internal combustion engines (including off-highway vehicles, chainsaws, generators, heavy equipment, etc.) with spark arresters. Qualified spark arresters will be in a maintained and nonmodified condition and meet U.S. Department of Agriculture Forest Service Standard 5100-1a, or the Society of Automotive Engineers Recommended Practices J335 or J350. Refer to 43 Code of Federal Regulations §8343.1.	Yes
FIRE-3	Restrict motorized equipment, including worker transportation vehicles, to the designated and approved work limits. Operate all vehicles on designated roads or park in areas where vegetation is less than 8 inches tall. Vehicles, including the undercarriages, will be cleared of vegetation accumulations and checked periodically to ensure no buildup of flammable vegetation.	Yes
FIRE-4	Require all motor vehicles and equipment to carry, and individuals using handheld power equipment to have, specified fire prevention equipment. Carry shovels, water, and fire extinguishers on all equipment and vehicles. Equipment will carry extinguishers rated ABC-10 pound minimum and vehicles will carry ABC-2.5 pound minimum.	Yes
FIRE-5	Provide a list of equipment capable of being adapted to fighting fires to local fire protection agencies.	Yes
FIRE-6	Notify the appropriate fire suppression agencies of scheduled road closures.	Yes

EPM Number	Environmental Protection Measures	Applicable to SRBOP
FIRE-7	Prohibit burning of slash, brush, stumps, trash, explosives storage boxes, or other Project-generated debris unless authorized by the applicable land management agency.	Yes
FIRE-8	Designate a Fire Guard on each construction crew prior to the start of construction activities each day and provide a communications system for maintaining contact with fire control agencies.	Yes
FIRE-9	The Companies shall comply with fire restrictions and/or waivers as applicable.	Yes
FIRE-10	If a fire spreads beyond the suppression capability of workers with these tools, all will cease fire suppression action and leave the area immediately via pre-identified escape routes.	Yes
FIRE-11	Initiate fire suppression actions in the work area to prevent fire spread to or on federally administered lands. If fire ignitions cannot be prevented or contained immediately, or it may be foreseeable to exceed the immediate capability of workers, the operation must be modified or discontinued. No risk of ignition or re-ignition will exist on leaving the operation area.	Yes
FIRE-12	Prior to any operation involving potential sources of fire ignition from vehicles, equipment, or other means, review weather forecasts and potential fire danger. Prevention measures to be taken each workday will be included in the specific job briefing. Consideration for additional mitigation or discontinuing the operation must be given in periods of extreme wind and dryness.	Yes
FIRE-13	Operate welding, grinding, or cutting activities in areas cleared of vegetation within range of the sparks for that particular action. A spark shield adequate for the sparks may be used to prevent sparks from carrying. A spotter equipped with a round-nose shovel and two ABC-rated 5-pound fire extinguishers and a 5-gallon backpack waterpump is required to watch for ignitions during, and one hour after, the activity. Water may be used to wet down surrounding vegetation but does not take the place of an adequately cleared area and spark shield.	Yes
FIRE-14	No smoking will be allowed while operating equipment or while walking or working in areas with vegetation.	Yes
FIRE-15	Smoke only in cleared areas.	Yes
FIRE-16	In areas where smoking is allowed, completely extinguish all burning tobacco and matches and discard them in ash trays, not on the ground.	Yes
FIRE-17	Do not allow any fires or barbecues on the transmission line ROW, at material yards, substations, access roads, or other construction areas.	Yes
FIRE-18	Clear away all flammable material to a minimum of 10 feet, including snags (fallen or standing dead trees) from areas of operation where a spark, fire, or flame could be generated.	Yes
FIRE-19	If a fire does start by accident, take immediate steps to extinguish it (if it is safe to do so) using available fire suppression equipment and techniques taught at field crew emergency response training provided by the Construction Contractor or the Companies.	Yes
CON-1	All construction staff will be trained on the types of contamination that could be encountered and how to respond if contamination is encountered.	Yes
NOISE		
NOISE-1	Identify and provide a public liaison person before, and during, construction to respond to concerns of neighboring receptors, including residents, about construction noise disturbance.	Yes
NOISE-2	Establish a toll-free telephone number for receiving questions or complaints during construction, and develop procedures for responding to callers.	Yes
NOISE-3	Implement and maintain a noise complaint review process to deal with residents' or other potential queries and complaints as they arise. Such complaints will be logged and investigated on an individual basis to facilitate resolution of the issue of concern.	Yes

1/ TESWL-3 has been offered by the Companies; however, although the Companies are encouraged to protect all prairie dog towns, formal black-footed ferret surveys within those towns will no longer be required by the BLM.

AGRI – agriculture; AIR – air quality; BLA – blasting; CON – contamination; CR – cultural resources; EE – electrical environment; FIRE – fire; FISH – fish; G – general; GEO – geologic hazards; LU – land use; NOISE – noise; OM – operations and maintenance; PALEO – paleontological resources; REC – reclamation; SOIL – soils; TESPL – threatened, endangered, and sensitive (TES) plants; TESWL – TES wildlife; TRANS – transportation resources; VEG – vegetation; VIS – visual; VR – visual resources; WEED – weeds; WET – streams and wetlands; WILD – wildlife; WQA – water quality

APPENDIX B
DETAILED CALCULATION SPREADSHEET FOR MEP VALUE

Proposed Mitigation Portfolio, ACRES (August 2014)

Segment	Route	Route Miles Across federal lands in SRBOP	Acres of Project occupancy INSIDE designated corridors			Acres of Project Occupancy OUTSIDE designated corridors			Total Project-Occupied Acres within SRBOP
			Natural Vegetation	Disturbed Vegetation*	Total	Natural Vegetation	Disturbed Vegetation*	Total	
Segment 8	BLM Preferred	2	t	t	0	3	5	8	8
	Proposed	18	0	0	0	2	27	28	28
Segment 9	BLM Preferred	11	3	7	10	4	14	18	28
	Proposed	46	0	0	0	14	56	69	69
Combined	BLM Preferred 8 & 9	13	3	7	10	7	19	26	36
	Proposed 8 & 9	64	0	0	0	15	82	97	97

* Vegetation that is now disturbed, before any construction impacts

Companies' Proposed Ratios	1	1	1	1	

Segment	Route	Route Miles Across BLM lands in SRBOP	Companies' Proposed Mitigation Acres INSIDE designated corridors			Companies' Proposed Mitigation Acres OUTSIDE designated corridors			Total Companies' Proposed Mitigation Acres
			Natural Vegetation	Disturbed Vegetation*	Total	Natural Vegetation	Disturbed Vegetation*	Total	
Segment 8	BLM Preferred	2	0	0.0	0	3	5	8	8
	Proposed	37	0	0.0	0	2	27	28	28
Segment 9	BLM Preferred	11	3	7	10	4	14	18	28
	Proposed	52	0	0	0	14	56	69	69
Combined	BLM Preferred 8 & 9	13	3	7	10	7	19	26	36
	Proposed 8 & 9	89	0	0	0	15	82	97	97

Proposed Mitigation Portfolio, COST BASIS (August 2014)

COST FACTORS	Companies
Cost/acre of reclamation	$ 1,800
Law Enforcement	$ 35,000

(based on small intensive projects within SRBOP and 80% success rate)
assumes 0.25 FTE for 10 years at $140,000 per FTE

Reduction of fixed costs from Companies' Proposed to BLM Preferred Routes based on relative miles crossed: 0.2

	Per-Segment Distribution by SRBOP Miles Crossed		
		Miles	Percent
BLM Preferred	Segment 8	2.0	15%
	Segment 9	11.2	85%
	TOTAL	**13.2**	
Companies Proposed	Segment 8	17.9	28%
	Segment 9	46.0	72%
	TOTAL	**63.9**	

Segment	Route	Route Miles Across BLM lands in SRBOP	Total Cost of Reclamation by Companies' Mitigation Acres
Segment 8	BLM Preferred	2	$ 14,400
	Proposed	37	$ 50,580
Segment 9	BLM Preferred	11	$ 50,400
	Proposed	52	$ 124,200
Combined	BLM Preferred 8 & 9	13	$ 64,800
	Proposed 8 & 9	89	$ 174,780

Proposed Mitigation Portfolio, COST SUMMARY (August 2014)

Segment	Route	Route Miles Across BLM lands in SRBOP	Reclamation cost	Law Enforcement (10 years)			Grand Total Companies' Mitigation Offer
Segment 8	BLM Preferred	2	$ 14,400	$ 10,606			$ 25,006
	Proposed	36.6	$ 50,580	$ 98,044			$ 148,624
Segment 9	BLM Preferred	11.2	$ 50,400	$ 59,394			$ 109,794
	Proposed	52.3	$ 124,200	$ 251,956			$ 376,156
Combined	BLM Preferred 8 & 9	13.2	$ 64,800	$ 70,000			$ 134,800
	Proposed 8 & 9	88.9	$ 174,780	$ 350,000			$ 524,780

Proposed Enhancement Portfolio, ACRES (August 2014)

Segment	Route	Route Miles Across BLM lands in SRBOP	Acres of Disturbance from Construction of Project INSIDE designated corridors			Acres of Disturbance from Construction of Project OUTSIDE designated corridors			Total Construction-Disturbed Acres within SRBOP
			Natural Vegetation	Disturbed Vegetation*	Total	Natural Vegetation	Disturbed Vegetation*	Total	
Segment 8	BLM Preferred	2	t	1	1	37	49	86	87
	Proposed	18	0	0	0	20	300	321	321
Segment 9	BLM Preferred	11	29	81	110	47	107	154	264
	Proposed	46	0	0	0	116	830	947	947
Combined	BLM Preferred 8 & 9	13	29	82	111	84	156	240	351
	Proposed 8 & 9	64	0	0	0	137	1131	1267	1267
				* Vegetation that is now disturbed, before any construction impacts					
	Companies' Proposed Ratios		1	0.5		2	1		

Segment	Route	Route Miles Across BLM lands in SRBOP	Companies' Proposed Enhancement Acres INSIDE designated corridors			Companies' Proposed Enhancement Acres OUTSIDE designated corridors			Total Companies' Proposed Enhancement Acres
			Natural Vegetation	Disturbed Vegetation*	Total	Natural Vegetation	Disturbed Vegetation*	Total	
Segment 8	BLM Preferred	2	t	0.5	1	74	49	123	124
	Proposed	18	0	0.0	0	40	300	341	341
Segment 9	BLM Preferred	11	29	41	70	94	107	201	271
	Proposed	46	0	0	0	233	830	1063	1063
Combined	BLM Preferred 8 & 9	13	29	41	70	168	156	324	394
	Proposed 8 & 9	64	0	0	0	273	1131	1404	1404

Proposed Enhancement Portfolio, COST BASIS (August 2014)

COST FACTORS	Companies	
Cost/acre of reclamation	$ 1,800	(based on small intensive projects within SRBOP and 80% success rate)
Land Purchase	$ 320,000	(based on 104-acre parcel purchase and comps at $3000/acre)
Visitor Enhancement	$ 500,000	(based on $50,000 per year for 10 years)
Law Enforcement	$ 1,750,000	(based on $140,000/yr FTE for fully equpt ranger, 0.75 FTE for enhancement)

LE assumes 10 years, 0.75 FTE plus 10 more years at 0.5 FTE

distribution of fixed costs of land purchase, visitor enhancement, and endowment fund across the two segments done by segment length on BLM lands within the SRBOP

Reduction of fixed costs from Companies' Proposed to BLM Preferred Routes based on relative miles crossed 0.2

	Per-Segment Distribution by SRBOP Miles Crossed		
		Miles	**Percent**
BLM Preferred	Segment 8	2.0	15%
	Segment 9	11.2	85%
	TOTAL	**13.2**	
Companies Proposed	Segment 8 + D&E	17.9	28%
	Segment 9 + G	46.0	72%
	TOTAL	**63.9**	

Segment	Route	Route Miles Across BLM lands in SRBOP	Total Cost of Reclamation by Companies' Enhancement
Segment 8	BLM Preferred	2	$ 222,300
	Proposed	18	$ 613,260
Segment 9	BLM Preferred	11	$ 486,900
	Proposed	46	$ 1,913,400
Combined	BLM Preferred 8 & 9	13	$ 709,200
	Proposed 8 & 9	64	$ 2,526,660

Proposed Enhancement Portfolio, COST SUMMARY (August 2014)

Segment	Route	Route Miles Across BLM lands in SRBOP	Reclamation cost	land purchase cost	law enforcement	visitor enhancement cost	Management Fund	Grand Total Companies' Enhancement Offer	Idaho Power Line Removal Cost to Companies
Segment 8	BLM Preferred	2	$ 222,300	$ 9,697	$ 53,030	$ 15,152	$ 151,515	$ 451,694	$1,922,000
	Proposed	18	$ 613,260	$ 89,640	$ 490,219	$ 140,063	$ 280,125	$ 1,613,307	$1,922,000
Segment 9	BLM Preferred	11	$ 486,900	$ 54,303	$ 296,970	$ 84,848	$ 848,485	$ 1,771,506	$1,922,000
	Proposed	46	$ 1,913,400	$ 230,360	$ 1,259,781	$ 359,937	$ 719,875	$ 4,483,353	$1,922,000
Combined	BLM Preferred 8 & 9	13	$ 709,200	$ 64,000	$ 350,000	$ 100,000	$ 1,000,000	$ 2,223,200	$1,922,000
	Proposed 8 & 9	64	$ 2,526,660	$ 320,000	$ 1,750,000	$ 500,000	$ 1,000,000	$ 6,096,660	$1,922,000

Appendix F
Draft Land Use Plan Amendments

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Acronyms and Abbreviations

ACEC	Area of Critical Environmental Concern
BLM	Bureau of Land Management
BMP	best management practice
CA	Conservation Agreement
CFR	Code of Federal Regulations
DEIS	Draft Environmental Impact Statement
EIS	Environmental Impact Statement
EPM	environmental protection measure
FEIS	Final Environmental Impact Statement
FLPMA	Federal Land Policy and Management Act of 1976
Gateway West	Gateway West Transmission Line Project
kV	kilovolt
LUP	land use management plan
MEP	Mitigation and Enhancement Portfolio
MFP	Management Framework Plan
MP	milepost
NCA	National Conservation Area
NEPA	National Environmental Policy Act
NHT	National Historic Trail
NOI	Notice of Intent
Project	Gateway West Transmission Line Project
RMP	Resource Management Plan
ROW	right-of-way
SEIS	Supplemental Environmental Impact Statement
SRBOP	Morley Nelson Snake River Birds of Prey National Conservation Area
SRMA	Special Recreation Management Area
TES	threatened, endangered, and sensitive
VRM	Visual Resource Management
WECC	Western Electricity Coordinating Council
WSR	Wild and Scenic River
WWE	West-wide Energy

1 Introduction

In April 2013, the Bureau of Land Management (BLM) published the Final Environmental Impact Statement (FEIS) for the Gateway West Transmission Line Project (Gateway West or Project), starting in Wyoming at the Windstar Substation and ending at the Hemingway Substation. In the Record of Decision, published in November 2013, the BLM deferred offering a Right-of-Way (ROW) Grant for Segments 8 and 9 to allow additional time for federal, state, and local permitting agencies to examine additional routing options and mitigation and enhancement measures for these segments (see Chapter 1 of the Supplemental Environmental Impact Statement [SEIS]).

The Proponents submitted a revised Project application for Segments 8 and 9 in August 2014 (Figure 1-1). The Proponents have also submitted a draft Mitigation and Enhancement Portfolio (MEP) to the BLM, which contains proposed mitigation, including compensatory mitigation, and other measures intended to enhance resources and values found in the SRBOP. The Segments 8 and 9 Revised Proposed Routes as currently proposed by the Proponents would require the amendment of BLM land use plans (i.e., resource management plans [RMPs] or management framework plans [MFPs]). The Segment 8 Revised Proposed Route would require one or more amendments to the Bennett Hills/Timmerman Hills MFP, the 1987 Jarbidge RMP,[1] the Morley Nelson Snake River Birds of Prey National Conservation Area (SRBOP) RMP, and the Kuna MFP. The Segment 9 Revised Proposed Route would require amendments to the Twin Falls MFP, the 1987 Jarbidge RMP, and the SRBOP RMP. The BLM developed two Route Variations to the Segment 9 Revised Proposed Route to avoid the Toana Freight Wagon Road, a National Register Historic site. Toana Road Variation 1 and Toana Road Variation 1-A would both cross the Jarbidge Planning area managed under the 2015 Jarbidge RMP. No amendment would be needed.

Additional routing options, 8G and 9K, were developed by the BLM to avoid the SRBOP (Figure1-1) to the extent feasible. These alignments closely follow Segment 8 and 9 routes that were analyzed in the FEIS, although in slightly different locations. The BLM also developed a combination route (8H) that includes the eastern portion of 8G (through the Monument and Jarbidge Field Offices) and the western portion of the Revised Proposed Route for Segment 9 (through the SRBOP). This route was developed for Alternatives 6 and 7, which use the FEIS Proposed Route and Route 9K, respectively, for the Segment 9 routing. There are a few areas where the routes follow new routing and, for some Alternatives, the alignments of Segment 8 routes (8G or 8H) and Segment 9 Routes (9K, FEIS Proposed 9) parallel each other with a 250-foot separation from just south of Glenns Ferry (Route 8G MP 44 and Route 9K MP 72.7) to the Hemingway Substation. This parallel routing crosses the SRBOP for approximately 10 miles just northwest of the Saylor Creek Range; the remainder of the parallel alignment avoids the SRBOP. Route 8G would require amendments to the SRBOP

[1] A new RMP for the Jarbidge Field Office was signed in September 2015. This RMP covers land within the current Field Office boundary, but not those areas that were covered in the 1987 RMP but are now in the Boise and Four Rivers Field Offices. No amendments are needed where the Project crosses the current Jarbidge Field Office boundaries.

RMP and the Bruneau RMP. Route 9K would require amendments to the Twin Falls MFP, the Bruneau RMP, and the SRBOP RMP. FEIS Proposed 9 would require amendments to the Twin Falls MFP, SRBOP RMP, and Bruneau MFP. See Chapter 2 of the SEIS for full route descriptions of the Alternatives.

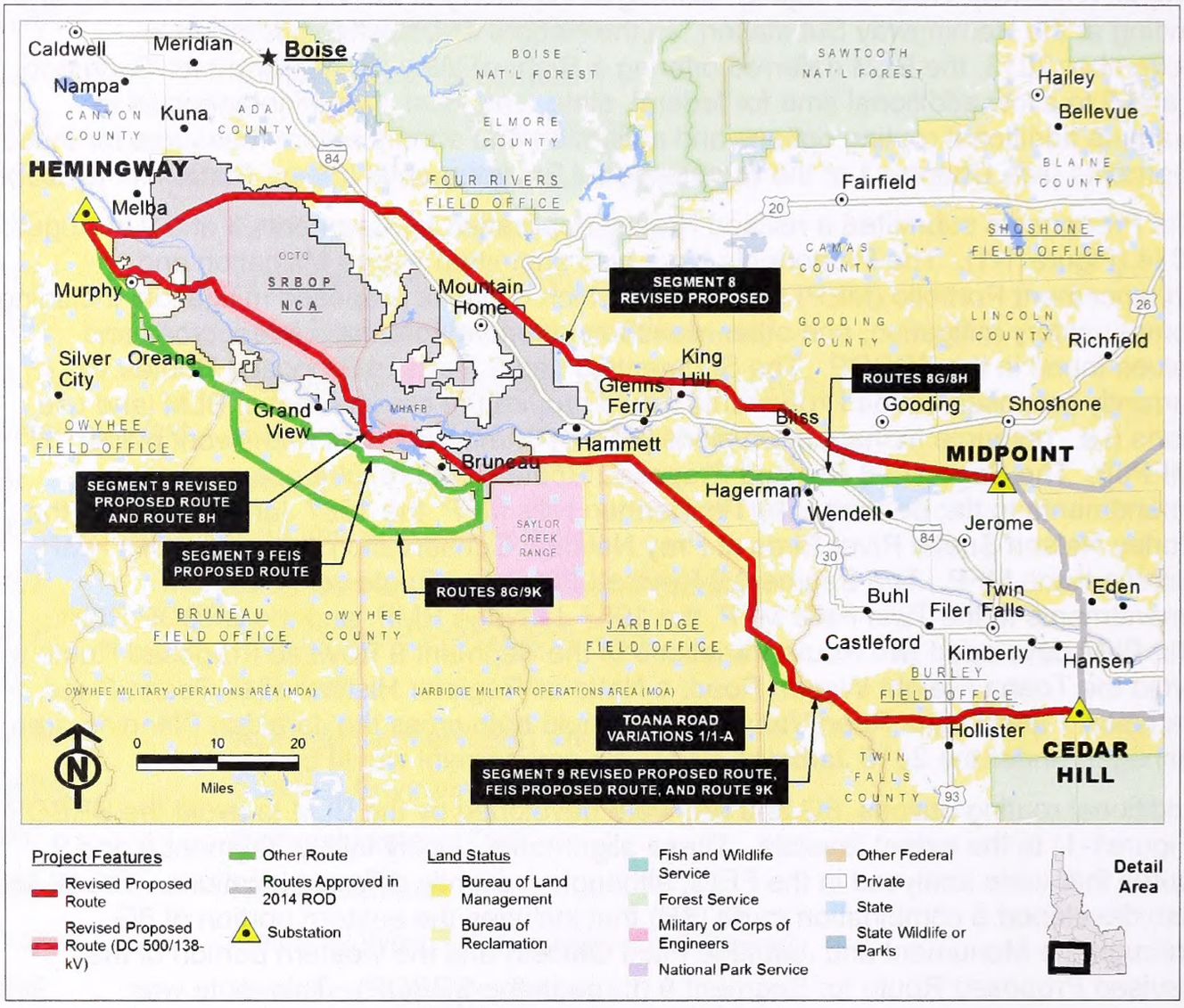

Figure F-1. Project Overview

Approval of a project-specific proposal that is not in conformance with the existing land use plan requires that a land use plan amendment be completed (BLM Land Use Planning Handbook H-1601-1[2]). Any decisions to amend a plan would be made concurrent with a decision on the Project. Amendments to the BLM RMPs and MFPs are summarized for each alternative in Table 2.3-1 of the SEIS (see Chapter 2 for more details). This document, Appendix F to the SEIS, includes a comparison of effects for each of the plan amendments required for all alternatives considered in detail in the SEIS.

[2] BLM. 2005. Land Use Planning Handbook. BLM Handbook H-1601-1. U.S. Department of Interior. March 11.

2 Planning Process

The planning action is to consider amending six BLM land use management plans (LUPs) as a part of the SEIS. This action is being considered under the BLM 1600 manual guidance (BLM Land Use Planning Handbook H-1601-1), and the planning regulations published as Title 43 Code of Federal Regulations (CFR) (including 1610.5-5, Amendments). This process is discussed in more detail in Chapter 2 of the Draft SEIS. Some of the LUPs crossed by the Project were approved in the 1970s and 1980s. As land use management needs and conditions change, the amendment process allows the BLM to amend plans to meet current needs when such actions are warranted. The process requires analysis of effects of these amendments, which is provided here (Appendix F) and in Appendix G (for additional analysis of visual impacts).

Scoping meetings were held for this Project in the fall of 2014. The public, as well as state, local, and tribal governments and federal agencies, was invited to participate in the planning process. Public scoping was initiated with the publication of a Notice of Intent (NOI) to prepare an SEIS in the Federal Register on September 19, 2014 (79 *Federal Register* 56399). The NOI was followed by a series of four public meetings held in October 2014. The public has been given the opportunity to comment on and provide additional information regarding the Project, including the possibility of BLM Plan amendments, during these meetings. The BLM is reviewing the effects of Project implementation through seven route combinations, referred to as Alternatives. Two Co-Preferred Alternatives (Alternative 2 and Alternative 5) were selected. Co-Preferred Alternative 2 includes the Revised Proposed Route for Segment 8 and the FEIS Proposed 9. Co-Preferred Alternative 5 includes Routes 8G and 9K. Proposed Amendments are those needed for the Co-Preferred Alternatives. The amendments considered for the Revised Proposed Routes and other routes were developed over the course of the SEIS process and consider planning requirements for the routes incorporated within each Alternative.

During the Draft Environmental Impact Statement (DEIS) process, a report (Land Use Plan Consistency Analysis, 2010) was compiled to document compliance with the 20 federal land use plans that provide direction for federal lands crossed by the Proposed Action or Action Alternatives for the Gateway West Project. This report was included as Appendix F in the Administrative Draft EIS submitted to the BLM and U.S. Department of Agriculture, Forest Service for review on March 15, 2010. From that analysis, needs for potential amendments were identified and analyzed based on planning issues and criteria. Amendments were proposed for the BLM-Preferred Route in the FEIS. The proposed amendments, and amendments that would be needed for other alternatives, were developed and presented in the FEIS and Appendices (see FEIS Appendices F-1 and F-2 for amendment language and analysis for the BLM-Preferred and Alternative Routes). These amendments were reviewed for the SEIS to determine which, if any, still applied and if additional amendments would be needed for the Revised Proposed Routes. The following sections address identified amendments that would be needed for the Segments 8 and 9 Revised Proposed Routes and additional Routes 8G, 8H, FEIS Proposed 9, and 9K.

2.1 Planning Issues and Criteria

The NOI listed the planning issues the BLM anticipated and invited the public, other federal agencies, as well as state, local, and Tribal governments to identify additional concerns or issues during scoping meetings and the comment period that followed.

2.1.1 Planning Issues

The following issues were brought up by the public during the DEIS public scoping (Tetra Tech 2009) and comment period, were raised by federal and state agencies during scoping and agency discussions, or must be considered as stipulated by law or regulation:

- Objection to location on private lands ("If the project is for the general public good, it should be on public lands");
- Reliability and proposed separation distances of transmission lines;
- Avoiding sensitive areas such as National Monuments and Wildlife Refuges, military operating areas, National Conservation Areas (NCAs), Areas of Critical Environmental Concern (ACECs), Wild and Scenic Rivers (WSR), and State Parks;
- Effects to Native American traditional cultural properties and respected places;
- Effects to paleontological resources;
- Effects on wildlife habitat, plants, and animals including threatened, endangered, and sensitive (TES) species;
- Effects to visual resources and existing viewsheds;
- Effects to National Historic Trails (NHTs) and their viewsheds;
- Effects to recreation resources;
- Land use conflicts and consistency with land use plans;
- Effects to soils and water from surface-disturbing activities;
- Effects to agriculture lands;
- Effect on local and regional socioeconomic conditions; and
- Management of invasive plant species and effective reclamation.

We reviewed the scoping comments received for this SEIS and determined that planning issues considered in the FEIS have not changed.

2.1.2 Planning Criteria

The following general planning criteria are being considered in the development of the proposed plan amendments:

- National Environmental Policy Act (NEPA);
- Existing laws, regulations, and BLM policies;
- Plans, programs and policies of other federal, state and local governments, and Indian Tribes;

- Public input;
- Future needs and demands for existing or potential resource commodities and values;
- Past and present use of public and adjacent lands;
- Environmental impacts;
- Social and economic values;
- Public welfare and safety; and
- President's National Energy Policy.

3 Draft Amendments

Amendments to the BLM's management plans would be needed to bring the Project into compliance with the applicable RMPs and MFPs for BLM-managed lands crossed by the Project. Instances where the Project may not be in conformance with applicable RMPs and MFPs include:

- Developing a new ROW outside of approved corridors,
- Crossing NHTs,
- Crossing ACECs,
- Allowing construction within 0.5 mile of sensitive plant habitat,
- Changing management in Special Recreation Management Areas (SRMA), and
- Changing Visual Resource Management (VRM) classifications

Effects on visual resources were determined through the use of computer modeling, field visits, and site-specific knowledge by local BLM staff. The analysis and effects determinations on visual resources are documented in Appendix G. These draft amendments reference the analysis, maps of the locations (referred to as areas of inconsistency), photographs, and simulations included in Appendix E and Appendix G. The visual analysis pertains only to the public lands, as the BLM does not establish visual management objectives for lands it does not manage.

3.1 Twin Falls MFP Draft Amendments

Actions that occur on lands managed by the Burley Field Office within the Twin Falls MFP Planning Area, including the granting of ROW under Title V of the Federal Land Policy and Management Act of 1976 (FLPMA) and VRM Class management, are guided by decisions recorded in the Twin Falls MFP approved in 1982, and in the 1989 Salmon Falls Creek ACEC designation amendment. The MFP[3] does not permit powerlines to the east or west of the two established corridors and designates land that would be crossed by the 500-kilovolt (kV) transmission line as VRM Classes I and II. The 1989 amendment restricts activities within the designated Salmon Falls Creek ACEC. The

[3] BLM. 1982. Twin Falls Management Framework Plan. BLM Burley Field Office, U.S. Department of Interior.

ACEC also includes a portion of Salmon Falls Creek that has been determined to be eligible for WSR status.

Although scenery is one of the river's outstanding remarkable values, the crossing point currently includes an existing single-phase, low-voltage distribution line and a paved road and bridge—the Lilly Grade Road. The towers would be located outside the WSR corridor (generally 0.25 mile wide). Only the transmission lines would cross the WSR eligible segment.

Section 2(b) of the WSR Act specifies the following:

> *Recreational River Areas: Recreational river areas are those rivers or sections of rivers that are readily accessible by road or railroad, that may have some development along the shorelines, and that may have undergone some impoundment or diversion in the past.*

Therefore, a transmission line crossing this portion of this eligible WSR segment would not affect the river's suitability as a Recreation River.

The Segment 9 Revised Proposed Route, FEIS Proposed 9, and Route 9K would cross through areas managed by the Twin Falls MFP in the same alignment as the 2013 FEIS Preferred Route. The alignment was selected to comply with Western Electricity Coordinating Council (WECC) requirements and to protect significant resources to the greatest extent feasible. These include, but are not limited to, TES species, sensitive lands, cultural resources, and visual resources. The Project would not conform to the Twin Falls MFP; therefore, land use plan amendments would be needed. Both Segment 9 routes for the Co-Preferred Alternatives, FEIS Proposed 9 (Alternative 2) and Route 9K (Alternative 5), follow the same alignment through this area. The remaining Segment 9 routes also share this alignment. Table F-1 lists the draft amendments for the Twin Falls MFP. Since the Segment 9 routes for all Alternatives follow the same alignment in this area, there are no separate amendments that are not also needed for the Co-Preferred Alternatives.

Table F-1. Draft Amendments for the Twin Falls MFP

Affected Alternatives	Number	Affected Route	Existing MFP Direction	Draft Amendment
Co-Preferred Alternative 2 **Co-Preferred Alternative 5** Alternative 1 Alternative 3 Alternative 4 Alternative 6 Alternative 7	SEIS-1	Revised Proposed 9/ 9K/FEIS Proposed 9	L-4.1 Allow future major power transmission lines (line of at least 46-138 kV which originate and terminate outside of the MFP area) to be constructed within the recommended corridors. Also allow construction of transmission lines between the corridors. Do not permit power lines to the west or the east of the two corridors. Exempt service lines from restriction.	Allow a 500-kV transmission line ROW outside of existing corridors.

Table F-1. Draft Amendments for the Twin Falls MFP (continued)

Affected Alternatives	Number	Affected Route	Existing MFP Direction	Draft Amendment
Co-Preferred Alternative 2 **Co-Preferred Alternative 5** Alternative 1 Alternative 3 Alternative 4 Alternative 6 Alternative 7	SEIS-2	Revised Proposed 9/ 9K/FEIS Proposed 9	VRM I – VRM 1.1 Manage Salmon Falls Canyon between the Salmon Falls Dam and Lilly Grade for natural ecological change in accordance with a VRM Class I designation. This designation would include only the area from rim to rim. Manage the canyon from Lilly Grade to Balanced Rock under a VRM Class II designation. 2. The ACEC is subject to the following resource restrictions....(2) avoid utility rights-of-way....management of the Salmon Falls ACEC in the Twin Falls Resource Area will be the same as in the Jarbidge Resource Area	The VRM Class I and II areas adjacent to the Roseworth Corridor (established by the 2015 Jarbidge RMP) will be reclassified to match the VRM classes in the Jarbidge RMP. Allow a 500-kV transmission line to cross Salmon Falls canyon through the ACEC, consistent with the corridor

The planning regulations at 43 CFR 1601 provide a process to consider plan amendments for actions that are not in conformance with the plan. Explanations and evaluations of the effects of selecting the route through areas managed by the Twin Falls MFP are provided in Appendix F-1 of the FEIS, Section 3.7. An abbreviated version is provided below.

3.1.1 Purpose and Need to Amend the Twin Falls MFP

The Twin Falls MFP restricts future major power transmission lines to the corridors designated in the MFP. Connecting lines between these corridors are permitted, however major powerlines to the east and west are not. Routing for Segment 9 in all Alternatives for the Gateway West Project would not be within the designated corridors and would cross the MFP from east to west.

Routing for Segment 9 in all Alternatives for the Gateway West Project would cross the Salmon Falls Creek ACEC. The Twin Falls MFP contains direction for managing visual resources that would restrict powerline construction, including direction to manage the Salmon Falls Canyon as VRM Class I between Salmon Falls Dam and Lilly Grade, and VRM Class II between Lilly Grade and Balanced Rock. The Twin Falls MFP Amendment in 1989 designating the Salmon Falls Creek ACEC prohibits the utilities from crossing of the Salmon Falls Creek ACEC. The 1989 Plan Amendment to the Twin Falls MFP regarding the establishment of the Salmon Falls Creek ACEC states the following:

> "2. The ACEC is subject to the following resource management restrictions: (1) exclude livestock grazing, (2) avoid all utility rights-of-way, (3) close to agricultural entry, (4) close to all motorized vehicle use, and (5) prohibit mechanized fire suppression equipment."

The 1989 amendment also states that management of the Salmon Falls Creek ACEC in the Twin Falls Resource Area would be the same as for the Jarbidge Resource Area.

The purpose of the draft amendments is to modify the MFP visual resource management designations and ACEC restrictions such that the Project would be in conformance with the revised Twin Falls MFP.

3.1.2 Project Alternatives and Associated Routing

The Segment 9 Revised Proposed Route, Route 9K, and FEIS Proposed 9 follow the same alignment through areas managed under the Twin Falls MFP. The transmission lines would be constructed utilizing 500-kV single-circuit lattice steel towers between 145 and 180 feet tall and would cross BLM-managed land covered by the Twin Falls MFP.

Segment 9 Revised Proposed Route: Segment 9 of the Revised Proposed Route (Alternative 1) enters lands managed by the Twin Falls MFP west of Cedar Hill. The route proceeds in a westerly direction and then turns north, paralleling Salmon Falls Creek, which the route would cross as it leaves the Twin Falls Planning Area. Segment 9 would cross the Salmon Falls Creek ACEC where the creek is designated a Recreation segment of the eligible WSR.

Additional Routes:

Route 9K (Co-Preferred Alternative 5 and Alternatives 3 and 7) follows the same alignment through the Twin Falls MFP Planning Area as the Segment 9 Revised Proposed Route and would therefore cross the same areas as described for the Revised Proposed Route.

FEIS Proposed 9 (Co-Preferred Alternative 2 and Alternatives 4 and 6) follows the same alignment through the Twin Falls MFP Planning Area as the Segment 9 Revised Proposed Route and would therefore cross the same areas as described for the Revised Proposed Route.

No Action Alternative: The No Action Alternative analyzed in the SEIS is the predicted result of the denial of the applications. Under the No Action Alternative, Gateway West would not be constructed; therefore, no associated plan amendments would be required.

The objectives of the Project, which include providing increased transmission capacity and a more reliable transmission line system for transport of energy, including wind energy, to meet existing and future needs (as described in SEIS Section 1.4, Proponents' Objectives for the Project), would not be met.

3.1.3 Amendments to the Twin Falls MFP Associated with the Co-Preferred Alternatives

Both Co-Preferred Alternatives would include routing for Segment 9 that would follow the same alignment through the Twin Falls MFP Planning Area. The Segment 9 Revised Proposed Route, FEIS Proposed 9 (Co-Preferred Alternative 2), and Route 9K (Co-Preferred Alternative 5) would all require a plan amendment to the Twin Falls MFP for granting of a ROW for the Project across lands managed by the Burley Field Office. Amendments are proposed for FEIS Proposed 9 and Route 9K for Co-Preferred

Alternatives 2 (Figure F-2a) and 5 (Figure F-2b), respectively. The Twin Falls MFP allows new utilities to be constructed within and between existing corridors and protects visual resources adjacent to Salmon Falls Creek. These MFP decisions would be rewritten to allow development of this Project.

Draft Amendment SEIS-1 for the Segment 9 Revised Proposed Route would rewrite the "Land 4.1" decision to allow the development of this Project (changes in italics):

> "Allow future major power transmission lines (line of at least 46-138 kV which originate and terminate outside of the MFP area) to be constructed within the recommended corridors. Also allow construction of transmission lines between the corridors. Do not permit power lines to the west or the east of the two corridors. *Allow a 500-kV transmission line ROW outside existing corridors.* Exempt service lines from restriction."

The Segment 9 Revised Proposed Route would require an amendment to the Twin Falls MFP VRM classification and Amendment (1989) regarding the establishment of the Salmon Falls Creek ACEC.

Draft Amendment SEIS-2 for the Segment 9 Revised Proposed Route would amend the VRM direction:

> "*The VRM Class I and II areas adjacent to the Roseworth Corridor (established by the 2015 Jarbidge RMP) will be reclassified to match the VRM classes in the Jarbidge RMP."*

Amendment SEIS-2 would also amend the Twin Falls MFP and 1989 Plan Amendment regarding the management of the Salmon Falls Creek ACEC:

> *"Allow a 500-kV Transmission Line Project to cross Salmon Falls canyon through the ACEC, consistent with the corridor established in the 2015 Jarbidge RMP."*

3.1.4 Amendments Associated with Routing not included in the Co-Preferred Alternatives

There are no additional amendments for routes that are not included in the Co-Preferred Alternatives. All routing that does not conform to the Twin Falls MFP follows the same alignment for all Alternatives. Therefore, amendment needs for the other Alternatives are the same as for the Co-Preferred Alternatives.

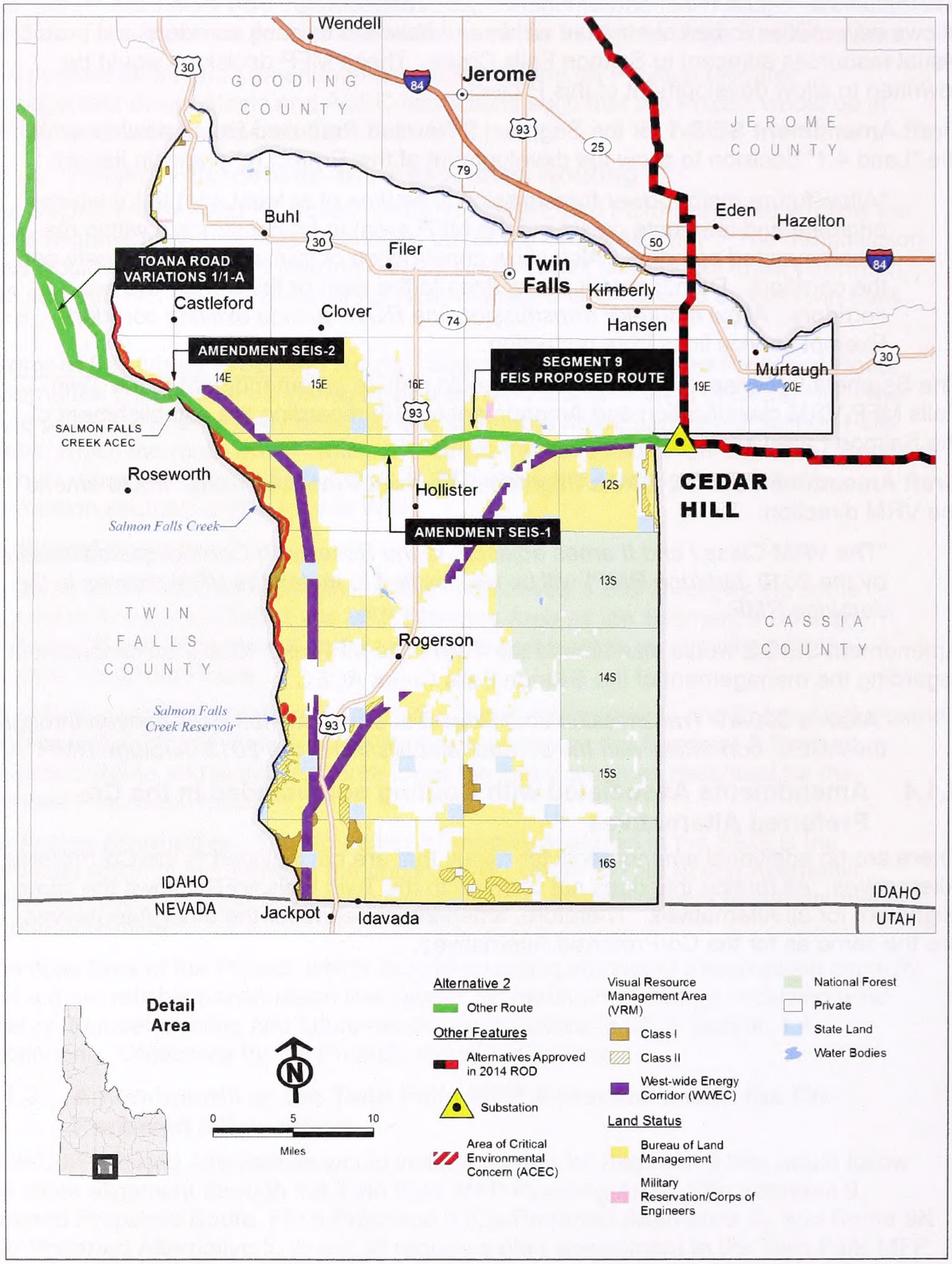

Figure F-2a. Location of Twin Falls MFP Amendments for Co-Preferred Alternative 2

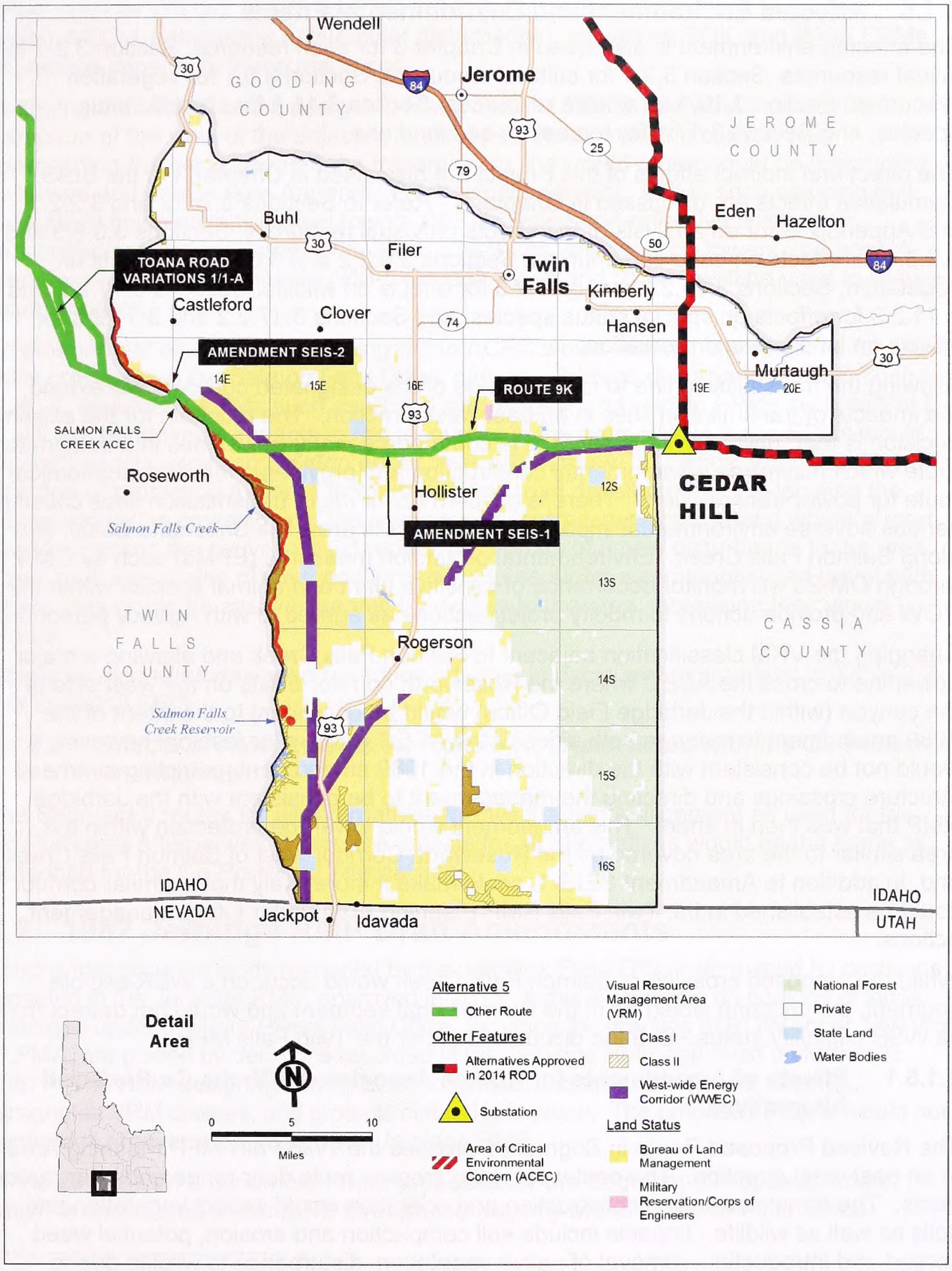

Figure F-2b. Location of Twin Falls MFP Amendments for Co-Preferred Alternative 5

3.1.5 Affected Environment and Environmental Effects

The affected environment is discussed in Chapter 3 for each resource: Section 3.2.1 for visual resources, Section 3.3.1 for cultural resources, Section 3.6.1 for vegetation resources, Section 3.10.1 for wildlife resources, Section 3.11.1 for special status species, and Section 3.17.1 for recreation and land use.

The direct and indirect effects of this Project are discussed in Chapter 3 of the SEIS. Cumulative effects are discussed in Chapter 4. Refer to Sections 3.2.2.2 and 3.2.2.3 and Appendix G for an analysis of the effects on visual resources; Sections 3.3.3.3 and 3.3.3.4 for effects on cultural resources; Sections 3.6.2.2 and 3.6.2.3 for effects on vegetation; Sections 3.10.2.2 and 3.10.2.3 for effects on wildlife; Sections 3.11.2.2 and 3.11.2.3 for effects on special status species; and Sections 3.17.2.2 and 3.17.2.3 for effects on land use and recreation.

Allowing the transmission line to cross outside of the designated corridors will extend the impacts of transmission lines in an east-west direction. The rationale for the existing decision is that "utility corridors serve to accommodate major powerlines in a designated route which minimizes environmental construction and provides a feasible, economical route for power transmission." There is concern about major transmission lines causing serious adverse environmental impacts in the Foothills area, the Shoshone Basin, and along Salmon Falls Creek. Environmental protection measures (EPMs) such as OM-21 through OM-23 will monitor occurrence of sensitive plant and animal species within the ROW and provide actions to modify project actions as agreed to with Agency personnel.

Changing the VRM classification adjacent to Salmon Falls Creek and allowing a major powerline to cross the ACEC where the Roseworth corridor exists on the west side of the canyon (within the Jarbidge Field Office) would be consistent to the intent of the 1989 amendment to manage both sides of the ACEC in a similar fashion; however, it would not be consistent with the direction in the 1989 amendment restricting overhead structure crossings and directing the management to be consistent with the Jarbidge RMP that was then in effect. This amendment would lower the protection within the area similar to the area covered by the Roseworth Corridor west of Salmon Falls Creek and, in addition to Amendment SEIS-1, could make it more likely that a similar corridor could be established in the Twin Falls RMP Planning Area under future management actions.

While the proposed crossing of Salmon Falls Creek would occur on a WSR-eligible segment, the crossing would be in the Recreational segment and would not detract from its WSR eligibility status. See the discussion under the Twin Falls MFP.

3.1.5.1 Effects of Amendments for Routes Associated with the Co-Preferred Alternatives

The Revised Proposed Route in Segment 9 crosses the Twin Falls MFP Planning Area in an east-west direction. The east-west route crosses mule deer range and near raptor nests. The transmission line construction and operation would impact vegetation and soils as well as wildlife. Impacts include soil compaction and erosion, potential weed spread and introduction, removal of native vegetation, disturbance to wildlife due to habitat fragmentation, behavioral avoidance of structures and roads, and dust and noise disturbance disrupting breeding and rearing. Best management practices (BMPs) and

EPMs such as WILD-2 (which restricts vehicular speeds and locations on project roads), VEG-1 (minimizing native plant disturbance), as well as SOIL and WQA EPMs will reduce impacts to these resources.

Changing the VRM Class II designated land north of Lilly Grade would result in a disruption of the view of the adjacent landscape. Views from the canyon and approaching the canyon where the transmission line would cross would be interrupted by towers and cables (see Appendix G for visual analysis). EPMs such as using dull galvanized finish on lattice steel towers (VIS-1), using non-reflective finishes on subconductors and insulators (VIS-2 and VIS-9), as well as siting towers and access roads to reduce visual impacts (VIS-5 through VIS-8 and VIS-11) will be used to reduce visual impacts.

An amendment allowing the crossing of the ACEC would retain the restrictions for future utility crossings of the Salmon Falls Creek canyon. Surface disturbance EPMs, such as SOIL-4, vegetation EPMs such as VEG-1 and VEG-4, and wildlife EPMs such as WILD-3, will aim to minimize impacts to the resources in the area. While these EPMs would reduce impacts, crossing Salmon Falls Creek within the ACEC would not meet the MFP direction of protecting the area from utilities and road development. Co-locating the transmission line crossing with the existing smaller transmission line and where a road already crosses the canyon would reduce the impact of a new disturbance to the area; however, it would also place these large structures along a commonly used travel path where they would be easily observed by visitors to the area, increasing their visual impact.

Mitigation measures designed to reduce adverse impacts are summarized in Table 2.7-1 of the 2013 FEIS.

3.1.5.2 Effects of Amendments for Routes Not Associated with the Co-Preferred Alternatives

The Segment 9 routes for all Alternatives follows the same alignment as used for the Co-Preferred Alternatives. Therefore, effects for all Alternatives would be the same as described for the Co-Preferred Alternatives

3.2 1987 Jarbidge RMP Draft Amendments

Actions that occur on lands managed by the Jarbidge Field Office are guided by decisions recorded in the Jarbidge RMP, approved in 2015. Actions occurring on portions of lands managed under the Four Rivers Field Office, including the granting of ROW under Title V of FLPMA, are guided by decisions recorded in the Jarbidge RMP approved on March 23, 1987.[4] The RMP designates utility avoidance/restricted areas for cultural features, designates VRM classes, and protects cultural resources. The proposed Project would not conform to requirements in the 1987 Jarbidge RMP.

In the 2013 FEIS, amendments were proposed for the Segment 9 Proposed Route, which is unchanged in the SEIS through the majority of the Jarbidge Field Office.

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[4] BLM. 1987. Jarbidge Resource Management Plan. BLM Jarbidge Field Office, U.S. Department of Interior.

Additionally, amendments were proposed for Alternatives 8A and 9B which are in similar locations for Route 8G. Amendments for these routes included allowing the project to cross the Salmon Falls Creek ACEC, changing VRM Class II areas to Class IV, and allowing the project to cross historic trails. The 2015 RMP designates a utility corridor through the ACEC, reclassifies the VRM, and provides language permitting crossing historic trails and their viewsheds, provided proper procedures are followed. This resulted in these amendments no longer being necessary.

The Revised Proposed Route for Segment 8, which is used in Co-Preferred Alternative 2, would cross area that is not covered by the 2015 Jarbidge RMP and still managed under the 1987 Jarbidge RMP. The Project would not be in conformance with management direction of this RMP in some areas and amendments would be required (see Table F-2a). The Revised Proposed Route for Segment 9 and Route 8H follow the same alignment through the western portion of the Jarbidge area and cross land currently still managed under the 1987 Jarbidge RMP just east of the SRBOP. A small portion of VRM Class II land is crossed and an amendment would be needed if an action alternative containing one of these routes (Alternative 1, 6, or 7) is selected (see Table F-2b).

Table F-2a. Draft Amendments for the 1987 Jarbidge RMP

Affected Alternatives	Number	Affected Route	Existing RMP Direction	Draft Amendment
Co-Preferred Alternative 2 Alternative 1 Alternative 3	SEIS-3	Revised Proposed 8	MUA-3 Utility avoidance/restricted area – three paleontological areas (Sugar Bowl, Glenn's Ferry, & McGinnis Ranch) and Oregon Trail ruts (7,200 acres/22.5 miles) to overhead and surface disturbance and underground utilities.	The current Lands decision is amended to reclassify the area identified as restricted in Section 35, T. 04 S., R. 09 E. to allow the overhead lines of a 500-kV powerline right of way while protecting the Oregon Trail ruts.
Co-Preferred Alternative 2 Alternative 1 Alternative 3	SEIS-4	Revised Proposed 8	Cultural Resources – The existing ruts of the main route, north and south alternate routes of the Oregon Trail and Kelton Road will be protected by not allowing incompatible uses to occur within ½ mile corridor through which these routes pass.	The existing ruts of the main route, north and south alternate routes of the Oregon Trail and Kelton Road will be protected by not allowing incompatible uses to occur within ½ mile corridor of ruts except where visual impacts are already compromised. Protect existing trail ruts from surface disturbance

Table F-2b. Amendments for the 1987 Jarbidge RMP for Non-Preferred Alternatives

Affected Alternatives	Number	Affected Route	Existing MFP Direction	Draft Amendment
Co-Preferred Alternative 2 Alternative 1 Alternative 3	SEIS-5	Revised Proposed 8	Visual Resource Management – The visual or scenic values of the public lands will be considered whenever any physical actions are proposed on BLM lands. The degree of alterations to the natural landscape will be guided by the criteria established for the four Visual Resource Management Classes as outlined in BLM 8400. VRM Classes will be managed as shown on Map 9.	The VRM decisions and Map 9 are amended to accommodate a major powerline R/W. These VRM boundaries are modified according to the new manual to reclassify the VRM Class I area associated with Oregon Trail and the Proposed 500-kV line as VRM Class IV
Alternative 1 Alternative 6 Alternative 7	SEIS-14	Segment 9 Revised Proposed Route/8H	Visual Resource Management – The visual or scenic values of the public lands will be considered whenever any physical actions are proposed on BLM lands. The degree of alterations to the natural landscape will be guided by the criteria established for the four Visual Resource Management Classes as outlined in BLM 8400. VRM Classes will be managed as shown on Map 9.	The VRM decisions and Map 9 are amended to accommodate a major powerline R/W. The VRM Classification is amended to change the VRM Class to VRM Class III, adjacent to the proposed line, where the towers would be visible and dominate the landscape

3.2.1 Purpose and Need to Amend the 1987 Jarbidge RMP

The Revised Proposed Routes for Segments 8 and 9, Routes 8G and 9K, FEIS Proposed 9, and the Toana Road Variations would cross through the Jarbidge Planning Area. The Revised Proposed Route for Segment 9, the Toana Road Variations, and Alternatives 8G and 9K would cross areas managed under the 2015 Jarbidge RMP. The Project would be in conformance with the 2015 Jarbidge RMP.

A small portion of the Revised Proposed Route for Segment 9 would cross land managed under the 1987 Jarbidge RMP that is managed by the Four Rivers Field Office. The Revised Proposed Route for Segment 8 crosses land managed under the 1987 Jarbidge RMP that is managed by the Four Rivers Field Office. The 1987 Jarbidge RMP includes management objectives for many resources including lands, minerals, range management, watershed, wildlife, visual, cultural, recreation, and transportation support. The RMP decisions that need to be amended relate to cultural and visual resources. The route locations for the Project were developed to comply with

WECC requirements and to protect significant resources to the greatest extent feasible. The Revised Proposed Route for Segment 8 is the same route as the BLM-Preferred Route in the FEIS. The Revised Proposed Route for Segment 9 is the same as the BLM-Preferred Route in the FEIS east of milepost (MP) 95.6, where it switches to the Alternative 9D/G alignment analyzed in the FEIS, with some modifications near C.J. Strike Reservoir.

The Project is not in conformance with the direction provided in the 1987 Jarbidge RMP; therefore, amendments to this LUP would be needed. The planning regulations at 43 CFR 1601 provide a process to consider plan amendments for actions that are not in conformance with the plan.

The Revised Proposed Route for Segment 8 (Co-Preferred Alternative 2 and Alternative 1) would cross MUA-3 where utilities are restricted. The following section is a requirement in the 1987 Jarbidge RMP for any activities conducted and/or authorized by the BLM in MUA-3:

> "MUA-3 Utility avoidance/restricted area – three Paleontological areas (Sugar Bowl, Glenns Ferry, & McGinnis Ranch) and Oregon Trail ruts (7,200 acres/22.5 miles) to overhead and surface disturbance and underground utilities." (Jarbidge RMP 11-19)

The Segments 8 (Co-Preferred Alternative 2 and Alternative 1) and 9 (Alternative 1) Revised Proposed Routes and Route 8H (Alternative 6 and 7) would cross areas managed for VRM Class I and Class II objectives. The following VRM direction under General Management Guidelines in the 1987 Jarbidge RMP applies:

> "Visual Resource Management – The visual or scenic values of the public lands will be considered whenever any physical actions are proposed on BLM lands. The degree of alterations to the natural landscape will be guided by the criteria established for the four Visual Resource Management Classes as outlined in BLM 8400. VRM Classes will be managed as shown on Map 9." (Jarbidge RMP 11-4)

The Segment 8 Revised Proposed Route would cross VRM Class I areas designated around the NHTs, for approximately 3.2 miles, and would not conform to the VRM objectives in this area (see Appendix G, Section 5.2.3, for the visual analysis). Amendment SEIS-8 addresses this nonconformance.

The 1987 Jarbidge RMP discusses requirements for areas listed on the National Register of Historic Places. The Segment 8 Revised Proposed Route would be within 0.5 mile of these resources. The route would cross the Oregon Trail and Kelton Road in three locations; however, only one location would be on BLM-managed land. A second crossing would be within 0.5 mile of BLM-managed land, but this management restriction for land near trails only applies where trail crossings occur on BLM-managed land. The following section is a requirement in the 1987 Jarbidge RMP for any activities conducted and/or authorized by the BLM:

> "The existing ruts of the main route, north and south alternate routes of the Oregon Trail and Kelton Road will be protected by not allowing incompatible uses to occur within ½ mile corridor through which these routes pass." (Jarbidge RMP 11-90)

An area north of the Hagerman Fossil Beds National Monument that would be crossed by the Project was incorrectly mapped as VRM Class II in the RMP. It is actually VRM Class III.

The purpose of the draft amendments for Co-Preferred Alternative 2 is to modify 1987 Jarbidge RMP decisions regarding visual resource, utility avoidance areas, special designations, and cultural resources such that the granting of a ROW for construction of the Project would be in conformance with the Jarbidge RMP. These amendments would also apply under Alternatives 1 and 3.

The Segment 9 Revised Proposed Route would cross VRM Class II land for 0.27 mile, just east of the SRBOP boundary. An amendment would be needed under Alternatives 1, 6, and 7 for routing in 8H or the Segment 9 Revised Proposed Route to conform to the VRM designations in the 1987 RMP.

3.2.2 Project Alternatives and Associated Routing

The Segments 8 and 9 Revised Proposed Routes, FEIS Proposed 9, Route 8H, Route 8G, Route 9K, and the Toana Road Variations would cross through lands managed under the 2015 Jarbidge RMP; however, only the Segments 8 and 9 Revised Proposed Routes and Route 8H would cross land still managed under the 1987 Jarbidge RMP. The transmission lines would be constructed utilizing 500-kV single-circuit lattice steel towers between 145 and 180 feet tall and would cross BLM-managed land covered by the Jarbidge RMP. The Revised Proposed Routes, Routes/Alternatives, and Variations are described in Chapter 2 of the SEIS, along with the FEIS routes and additional routes not considered in detail, and reasons for considering these routes.

Revised Proposed Routes: The Revised Proposed Routes through the 1987 Jarbidge Planning Area follow the FEIS Proposed Routes for Segments 8 and 9 for the majority of the lengths through the Planning Area.

Segment 8: The Segment 8 Revised Proposed Route (Alternatives 1, 2, and 3) is the same as the Proposed Route analyzed in the FEIS. It enters the 1987 Jarbidge RMP Planning Area (in the Four Rivers Field Office) west of King Hill and continues in a westerly direction where it leaves the 1987 Jarbidge RMP Planning Area east of the Hot Springs Reservoir. Segment 8 is within the Planning Area for approximately 12 miles, 6.4 of which are located on BLM-managed land.

Segment 9: The Segment 9 Revised Proposed Route (Alternative 1) is same as the FEIS Preferred Route. It enters the 2015 Jarbidge RMP Planning Area (within the Jarbidge Field Office) in the Salmon Falls Creek ACEC at Lilly Grade and continues for approximately 40 miles to the north-northwest inside the eastern boundary of the Planning Area and then continues west for approximately 12 miles before exiting the 2015 Jarbidge RMP Planning Area. The route then crosses the 1987 Jarbidge RMP Planning Area for approximately 3 miles before entering the SRBOP.

Additional Routes: While all remaining routes cross the land managed under the 2015 Jarbidge RMP, Route 8H (Alternatives 6 and 7) is the only one that crosses land still managed under the 1987 Jarbidge RMP. Routes 8G (Alternatives 4 and 5), FEIS Proposed 9 (Alternatives 2, 4, and 6), and 9K (Alternatives 5 and 7) would cross lands managed under the 2015 Jarbidge RMP. Route 9K follows the Segment 9 Revised

Proposed Route for much of its length in this area, and Route 8G enters the Planning Area from the east before paralleling 9K through the rest of the Planning Area.

FEIS Proposed 9 follows the same alignment as the Revised Proposed Route through the majority of the Jarbidge RMP Planning Area. At the western end, this route follows the West-wide Energy (WWE) corridor through the eastern section of the SRBOP, and then follows the WWE corridor south of the SRBOP for the majority of the rest of the route.

Route 9K follows the same alignment as the Segment 9 Revised Proposed Route through the 2015 Jarbidge RMP Planning Area until after it leaves the Planning Area (and thus the Jarbidge Field Office) and enters the SRBOP Planning Area. Unlike the Segment 9 Revised Proposed Route, however, 9K re-enters the Jarbidge Field Office at approximately MP 98 and continues generally south for approximately 3 miles before turning west and exiting the planning area near MP 101.

Route 8G enters the Jarbidge RMP Planning Area near MP 24.4 just after crossing the Snake River, north of the existing 500-kV line, Lower Salmon Falls Dam, and multiple lower voltage transmission lines, and approximately 1.0 to 1.25 miles north of Hagerman Fossil Beds National Monument. From there it continues west, remaining 250 feet north of and parallel to the existing 500-kV line, within the WWE corridor on public land. Route 8G crosses areas of extensive wind energy development to the Twin Falls/Elmore County line. At MP 26.6, approximately 1.9 miles of the existing 500-kV transmission line would be rebuilt 250 feet to the south to avoid existing agricultural and windfarm infrastructure on private land, and Route 8G would follow the current alignment for the existing 500-kV line for approximately 5 miles before leaving the existing 500-kV line and continuing west, still within the WWE corridor, and roughly following the southern leg of the FEIS Route 8A and northern leg of the FEIS Route 9B. At MP 44, it meets up with 9K and parallels the line, approximately 250 feet to the north and east through the rest of the 2015 Jarbidge RMP Planning Area.

Toana Road Variations: These variations, just west of Devil Creek, were developed by the BLM to avoid paralleling the Toana Freight Wagon Road, a National Register Historic Site. After the 2013 FEIS, BLM archaeologists determined that the Proposed Route paralleled within 0.25 mile of the Toana Road between MP 38.2 and 40.6, and paralleled within 1 mile of the road through Blue Gulch between MP 40.6 and 43.5.

Toana Road Variation 1 (Co-Preferred Alternatives 2 and 5): Toana Road Variation 1 to the Proposed Route is approximately 9 miles in length. It deviates from the Proposed Route at MP 38.2, crossing the Toana Freight Wagon Road at MP 0.3, and continuing in a westerly direction an additional 1.7 miles. The variation then turns north along the base of Castleford Butte and continues an additional 7 miles before rejoining the Proposed Route at MP 46.8, near Balanced Rock Road. Approximately 0.3 mile of the route crosses State land, with the remainder of the route on land managed by the BLM.

Toana Road Variation 1-A: The Toana Road Variation 1-A to the Segment 9 Revised Proposed Route was also recommended by BLM to minimize visual impacts to the Toana Freight Wagon Road, but also to utilize existing roads and to minimize new road construction in the area. Variation 1-A also deviates from the Proposed Route at MP 38.2 and follows the same alignment as Variation 1 for the first 2 miles before turning

north. At MP 3.6, the variation crosses, and then closely parallels Kinyon Road an additional 3.4 miles. At MP 7, the alignment turns to the northwest for 1.8 miles, rejoining the Proposed Route at MP 46.8, near Balanced Rock Road. Approximately 1 mile of the route crosses state land, with the remainder of the route variation on land managed by the BLM.

No Action Alternative: The No Action Alternative is the predicted result of the denial of the applications. Under the No Action Alternative, Gateway West would not be constructed (no construction of the new substations, substation expansion, or the transmission line); therefore, no associated plan amendments would be required. The objectives of the Project, which include providing increased transmission capacity and a more reliable transmission line system for transport of energy, including wind energy, to meet existing and future needs (as described in SEIS Section 1.4, Proponents' Objectives for the Project), would not be met.

3.2.3 Amendments to the 1987Jarbidge RMP Associated with the Co-Preferred Alternative 2

Co-Preferred Alternative 2 contains routing that would require an amendment to the 1987 Jarbidge RMP. Portions of the Revised Proposed Route for Segment 8 (Co-Preferred Alternative 2), Route 8G (Co-Preferred Alternative 5), FEIS Proposed 9 (Co-Preferred Alternative 2), and Route 9K (Co-Preferred Alternative 5) cross areas managed under the 1987 and 2015 Jarbidge RMPs. Approval of the 2015 Jarbidge RMP resulted in no amendments being required for those portions of the routes occurring within the current boundaries of the Jarbidge Field Office. Route 8G, 2013 FEIS Proposed 9, and Route 9K cross the current boundaries of the Jarbidge Field Office and do not cross land still managed under the 1987 Jarbidge RMP; therefore, no additional amendments are associated with these routes. Amendments are therefore only considered for Co-Preferred Alternative 2. Required amendments apply to the Segment 8 Revised Proposed Route where it crosses land in the Four Rivers Field Office that is still managed under the 1987 Jarbidge RMP. This area is north of the current Jarbidge Field Office boundary (Figure F-3). While the impacts from these amendments were analyzed in the 2013 FEIS, the analysis is provided here for continuity. In addition, amendments have been renumbered to conform to the structure of the SEIS.

The Segment 8 Revised Proposed Route would require an amendment where it crosses a utility avoidance/restricted area designated in the 1987 Jarbidge RMP.

Draft Amendment SEIS-3 for the Segment 8 Revised Proposed Route would amend the Lands decision and would read:

> *"The current Lands decision is amended to reclassify the area identified as avoidance/restricted in Section 35, T. 04 S., R. 09 E. to allow the overhead lines of a 500-kV powerline right of way while protecting the Oregon Trail ruts."*

The Segment 8 Revised Proposed Route would require a plan amendment to the 1987 Jarbidge RMP if it was selected to address cultural resources.

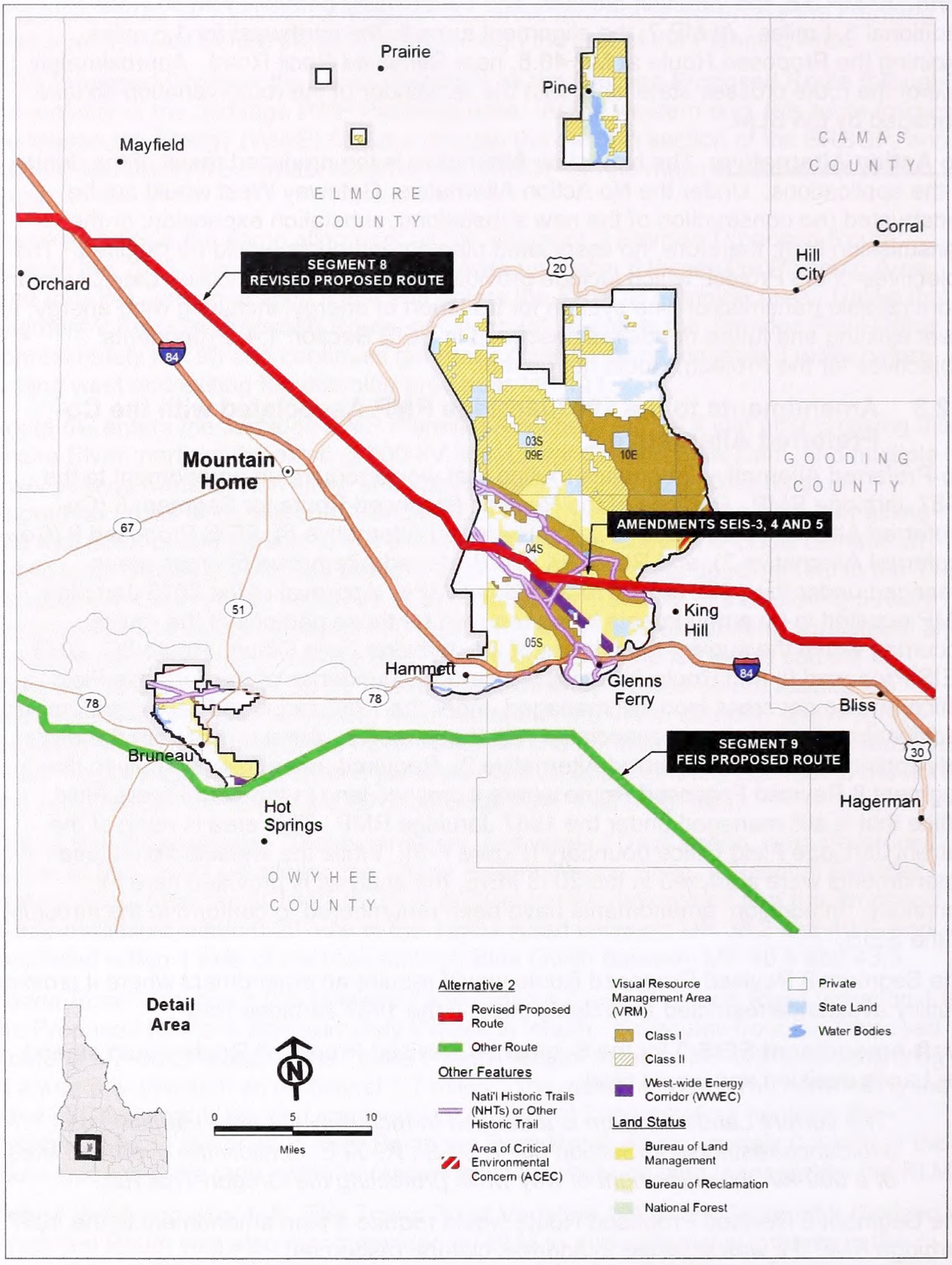

Figure F-3. Locations of 1987 Jarbidge RMP Amendments for Co-Preferred Alternative 2

Draft Amendment SEIS-4 for the Segment 8 Revised Proposed Route would amend the Cultural Resources direction in the 1987 Jarbidge RMP. The amendment would read (revisions in italics):

> "The existing ruts of the main route, north and south alternate routes of the Oregon Trail and Kelton Road will be protected by not allowing incompatible uses to occur within 0.5 mile corridor of ruts *except where visual impacts are already compromised.* Protect the existing trail ruts from disturbance."

The Segment 8 Revised Proposed Route would cross VRM Class I land associated with the Oregon NHT. Visual resources are managed according to Map 9 in the Jarbidge RMP. A powerline would not conform to VRM I objectives, and an amendment would be needed.

Draft Amendment SEIS-5 for the Segment 8 Revised Proposed Route would amend the VRM management and would read:

> *"The VRM decision and Map 9 are amended to accommodate a major powerline R/W. The VRM Class I area associated with the proposed 500-kV line and adjacent existing* powerlines *would be reclassified to VRM Class IV, according to definitions provided in the new manual."*

3.2.4 Amendments Associated with Routing not included in the Co-Preferred Alternatives

Alternatives 1 and 3 also include the Revised Proposed Route for Segment 8 and would require the same amendments discussed above for the Co-Preferred Alternative 2: Amendments SEIS-3, SEIS-4, and SEIS 5.

Alternative 1 includes Segment 9 of the Revised Proposed Route. Route 8H, which is included in Alternatives 6 and 7, follows the same routing as Segment 9 of the Revised Proposed Route through the Jarbidge area. This alignment crosses land in the Four Rivers Field Office that is still managed under the 1987 Jarbidge RMP. A small parcel of VRM Class II managed land is crossed in this area, just before the route enters the SRBOP for the second time. Segments of the Oregon Trail are present to the north of the alignment. A transmission line would not be consistent with the VRM Class II designation and an amendment would be needed.

The Segment 9 Revised Proposed Route, if selected, would require a plan amendment to the Jarbidge RMP where the route crosses VRM Class II land just east of the SRBOP.

Amendment SEIS-8 for the Segment 9 Revised Proposed Route and Route 8G would amend the VRM management and would read:

> *"The VRM decision and Map 9 are amended to accommodate a major powerline R/W. The VRM Classification is amended to change the VRM Class to VRM Class III, adjacent to the proposed line, where the towers would be visible and dominate the landscape."*

3.2.5 Affected Environment and Environmental Effects

The affected environment is discussed in Chapter 3 for each resource: Section 3.2.1 for visual resources, Section 3.3.1 for cultural resources, Section 3.6.1 for vegetation resources, Section 3.10.1 for wildlife resources, Section 3.11.1 for special status species, and Section 3.17.1 for recreation and land use.

The direct and indirect effects of this Project are discussed in Chapter 3 of the SEIS. Cumulative effects are discussed in Chapter 4. Refer to Section 3.2 and Appendix G for an analysis of the effects on visual resources; Section 3.3 for effects on cultural resources; Sections 3.6 vegetation; Section 3.10 effects on wildlife; Section 3.11 for effects on special status species; and Section 3.17 for effects on land use and recreation.

Changing Utility/Avoidance area classifications and modifying protection language around cultural resources could result in reduced management actions geared towards protection of archaeological resources. In areas where the VRM class is changed from Class I or II to Class III or IV, an amendment would result in the area being managed at a lower protection level.

3.2.5.1 Effects of Amendments for Routes Associated with Co-Preferred Alternatives

Changing the restricted/avoidance area to allow a 500-kV ROW would result in reduced protection for the values of the trail for which the restricted area was partially established. The Revised Proposed Route for Segment 8 would cross the North Alternate Study Trail within the restricted/avoidance area. A 220-kV line already crosses the trail near this location. This amendment allowing an additional line, while restricting surface disturbance activities, will further impact the historical landscape within these locations, however, it will still maintain the physical integrity of the trail at the crossing and adjacent locations. The RMP states that "rights-of-way, under Title V of FLPMA, will be considered in the Jarbidge Resource Area except where specifically identified in the RMP for avoidance." The RMP also protects 9 sites (including the Oregon Trail Area) with "areas of significant public values" through this special designation. Changing the designation in this area to allow the Project, while protecting trail ruts, would not protect the area from visual intrusion and would only protect the physical presence of the trail. The BLM Manual 6280 Study conducted for this Project (see Appendix J in the SEIS) rated the area as having a Scenic Quality Rating of C and concluded that the Project, while creating a strong visual contrast at a local KOP (C1511), would create a moderate adverse visual impact and would not affect the Scenic Quality Rating, due to the existing cultural modifications within the area.

Additionally, changing the restricted area designation around important paleontological sites may impact the fossil resources of the area. While construction disturbance activities could result in the discovery of isolated fossil specimens, the scientific information provided by fossils is maximized by discovery of fossil specimens preserved in place within the host geologic formations, and construction techniques are more likely to damage specimens than discover them. The change in designation could lead to additional development of the corridor, extending the impacts beyond the effects of the Project. Mitigation measures to reduce effects to these resources include surveys in

potential fossil yield areas (PALEO-5), altering surface-disturbing activities and schedules if resources are discovered (PALEO-1) as well as ensuring appropriate management is applied where relevant (PALEO-2 and PALEO-3), and development and following of a Paleontological Resources Preservation Plan (PALEO-4). Additionally, mitigation measures associated with cultural resources (CR-1 through CR-8) will minimize disturbance to cultural resources such as NHTs in the affected area.

Changing the VRM from Class I to Class IV near the Oregon Trail would remove some protections aimed at protecting the visual landscape surrounding the North Alternate Study Trail. This section of the Oregon Trail is currently under review to determine if it should be included as a National Historic Trail. The trails analysis in the BLM Manual 6280 Study (see Appendix J in the SEIS) stated that the Visual Resource Inventory (VRI) rates this area as Class C, which indicates scenery without much diversity in terms of landscape features and is the lowest rating from an aesthetic perspective. As stated above, this analysis also concluded that the presence of a new 500-kV line would not lower the Visual Quality Rating of the area due to existing cultural modifications. The management guidance for the 1987 Jarbidge RMP states that:

> "Visual Resource Management – The visual or scenic values of the public lands will be considered whenever any physical actions are proposed on BLM lands. The degree of alterations to the natural landscape will be guided by the criteria established for the four Visual Resource Management Classes as outlined in BLM 8400."

The 1984 BLM Manual 8400 states that the "visual management objectives (classes) are developed through the RMP process for all Bureau lands. The approved VRM objectives shall result from, and conform with, the resource allocation decisions made in RMP's [sic]."[5] The manual discusses visual design considerations and gives an overview of the Visual Resource Management System and refers the reader to BLM Manual Sections 8410 and 8431 for Visual Resource Inventory and Contrast Rating methods, respectively. The guidance in these two manuals indicates that the area considered in the amendment may no longer qualify as VRM Class I using the VRI directions in Manual Section 8410. Amending the VRM Class I area around the NHT to VRM Class IV would be in keeping with the management direction under the new guidance for visual resource protection. The viewsheds for the trail in this area are already highly compromised, with multiple existing transmission lines running north of the proposed route. In addition, a WWE corridor is designated directly south of the proposed alignment. However, as stated in BLM Manual 8400, the RMP determines the VRM Classification of an area. Therefore, an amendment is still required.

In areas where the VRM class is changed from Class I or II to Class III or IV, an amendment would result in the area being managed at a lower protection level. Amending the VRM Class I area around the NHT to VRM Class IV would be in keeping with the management direction under the new guidance for visual resource protection.

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[5] BLM. 1984. BLM Manual 8400-Visual Resource Management. Available online at: http://www.blm.gov/style/medialib/blm/wo/Information_Resources_Management/policy/blm_manual.Par.34032.File.dat/8400.pdf

The viewsheds for the trail in this area are already highly compromised, with multiple existing transmission lines running north of the proposed route. In addition, a WWE corridor is designated directly south of the proposed alignment.

EPMs such as using dull galvanized finish on lattice steel towers (VIS-1), using non-reflective finishes on subconductors and insulators (VIS-2 and VIS-9), as well as siting towers and access roads to reduce visual impacts (VIS-5 through VIS-7 and VIS-11) will be used to reduce visual impacts. Amending the RMP to lower the VRM classification may encourage additional development in these areas, which would further impact the visual resources, beyond the Project actions.

Mitigation measures designed to reduce adverse impacts are summarized in Table 2.7-1 of the FEIS.

3.2.5.2 Effects of Amendments Associated with Route Alternatives and Variations

Changing the VRM Class II area near the C.J. Strike Reservoir to VRM Class III would reduce the visual protection within the Snake River area. The presence of a tower in this location could impact the visual experience of recreational users along the rim of the canyon. This parcel of VRM Class II area is relatively small, and the proposed project would sit back from the rim, which may reduce the impact of recreational users within the canyon and reservoir. Changing the VRM class could potentially allow for future project to be constructed closer to the canyon rim, which would have increased visibility. The proposed area for reclassification is relatively small, however, and additional plan modification might be required for new projects.

3.3 SRBOP RMP Draft Amendments

The SRBOP RMP,[6] approved in September 2008, guides decisions made by the Four Rivers Field Office regarding actions that occur in the SRBOP Planning Area. These include decisions on the granting of ROWs under Title V of FLPMA. The RMP restricts major utility development to two existing corridors in the SRBOP Planning Area. The RMP also includes management direction for motorized vehicle use, protects visual resources, and prohibits surface disturbing activities near special status species. The Project does not conform to decisions in the SRBOP RMP. Plan amendments would be needed for the Revised Proposed Routes in Segments 8 and 9 regarding utility corridor restrictions, visual resources, and special status species.

An amendment would be needed if any Alternative is selected, since all route combinations cross the SRBOP. Since the Co-Preferred Alternative 2 contains Revised Proposed Routes for Segments 8 and 9, amendments are drafted for the SRBOP RMP (see Table F-3a). Amendments for the SRBOP RMP that are associated with other Alternatives are presented in Table F-3b.

[6] BLM. 2008. Snake River Birds of Prey National Conservation Area Resource Management Plan and Record of Decision. Boise District Office. September. Available online at: https://eplanning.blm.gov/epl-front-office/projects/lup/35553/41906/44406/Snake_River_Birds_of_Prey_RMP_RoD_2008_508.pdf

Table F-3a. Draft Amendments for the SRBOP RMP

Affected Alternatives	Number	Affected Route	Existing RMP Direction	Draft Amendment
Co-Preferred Alternative 2 Alternative 1 Alternative 3	SEIS-6	Revised Proposed 8	Utility and Communication Corridors – Restrict major utility developments to the two utility corridors identified (Lands Map 3).	Restrict major utility developments to the two utility corridors identified (Lands Map 3) and allow an additional major powerline ROW as applicable with laws and values for which the SRBOP NCA was designated. Designate an additional corridor to include the existing Summer Lake line and an additional 500 kV line.
Co-Preferred Alternative 2 Alternative 4 Alternative 6	SEIS-7	FEIS Proposed 9	Utility and Communication Corridors – Restrict major utility developments to the two utility corridors identified (Lands Map 3).	Restrict major utility developments to the two utility corridors identified (Lands Map 3) and allow an additional major powerline ROW as applicable with laws and values for which the SRBOP NCA was designated. Designate an additional corridor to include a 500 kV line.
Co-Preferred Alternative 2 **Co-Preferred Alternative 5** Alternative 1 Alternative 3 Alternative 4 Alternative 6 Alternative 7	SEIS-8	Revised Proposed 8, FEIS Proposed 9, 8G, Revised Proposed 9, and 9K	Sensitive Plant Habitat Include in all BLM authorizations permitting surface disturbing activities (non-grazing), requirements that (1) affected areas be reseeded with a perennial vegetative cover, and (2) surface disturbing activities be located at least 1/2 mile from occupied sensitive plant habitat.	Gateway West will be allowed within 0.5 mile of occupied, sensitive plant habitat, with appropriate mitigation to protect sensitive plants, including slickspot peppergrass (see Appendix F).
Co-Preferred Alternative 5	SEIS-13	8G and 9K	Utility and Communication Corridors – Restrict major utility developments to the two utility corridors identified (Lands Map 3).	Restrict major utility developments to the two utility corridors identified (Lands Map 3) and allow an additional major powerline ROW as applicable with laws and values for which the SRBOP NCA was designated. Designate an additional corridor to include two 500 kV lines.

Table F-3b. Amendments for the SRBOP RMP for Non-Preferred Alternatives

Affected Alternatives	Number	Affected Route	Existing MFP Direction	Draft Amendment
Alternative 1 Alternative 6 Alternative 7	SEIS-15	Segment 9 Revised Proposed Route/ 8H	VRM II Protect the Oregon Trail and management areas along the Snake River Canyon as a Visual Resource Management (VRM) Class II area, the Army National Guard Orchard Training Area (OTA) as Class IV and remaining areas as Class III. [Visual Resource Management (VRM Map)]	A corridor 250 feet from the centerline of the proposed powerline would be established with a VRM of Class III. This corridor would maintain a distance of at least 0.5 mile from the NHT, except where it crosses the trail.
Alternative 1 Alternative 6 Alternative 7	SEIS-16	Segment 9 Revised Proposed Route/ 8H	This SRMA consists of 22,300 acres in the Snake River Canyon downstream from Grandview, Idaho that is managed for the protection of cultural and scenic values. (2.14 Recreation 2-20).	This SRMA consists of 22,300 acres in the Snake River Canyon downstream from Grandview, Idaho that is managed for the protection of cultural and scenic values. Allow a 500-kV transmission line to cross the SRMA while protecting cultural resources from surface disturbance.
Alternative 1 Alternative 6 Alternative 7	SEIS-17	Segment 9 Revised Proposed Route/ 8H	C.J. Strike SRMA: This SRMA consists of 20,000 acres surrounding C.J. Strike Reservoir along the Snake River. The purpose of the SRMA is to provide enhanced recreation management associated with the reservoir, and protection of the Oregon Trail adjacent to the reservoir (2.14 Recreation 2-20).	C.J. Strike SRMA: This SRMA consists of 16,900 acres surrounding C.J. Strike Reservoir along the Snake River. The purpose of the SRMA is to provide enhanced recreation management associated with the reservoir, and protection of the Oregon Trail adjacent to the reservoir. Allow a 500-kV transmission line to cross the SRMA while protecting the Oregon Trail from surface disturbance.
Alternative 1 Alternative 6 Alternative 7	SEIS-18	Segment 9 Revised Proposed Route/ 8H	VRM II Protect the Oregon Trail and management areas along the Snake River Canyon as a Visual Resource Management (VRM) Class II area, the Army National Guard Orchard Training Area (OTA) as Class IV and remaining areas as Class III. [Visual Resource Management (VRM Map)]	VRM Class II areas associated with the Oregon Trail and Snake River that are in view of the 500-kV transmission line that would not meet VRM Class II objectives of the C. J. Strike SRMA would be reclassified to VRM Class III.

Table F-3b. Amendments for the SRBOP RMP for Non-Preferred Alternatives (continued)

Affected Alternatives	Number	Affected Route	Existing MFP Direction	Draft Amendment
Alternative 1 Alternative 6 Alternative 7	SEIS-19	Segment 9 Revised Proposed Route/ 8H	2.16 Transportation – Close the following areas to motorized vehicles: … Cove – 1,600 acres (Transportation Map A-145).	The area is closed to motorized vehicle use, subject to authorized use.
Alternative 1 Alternative 6 Alternative 7	SEIS-20	Segment 9 Revised Proposed Route/ 8H	Utility and Communication Corridors – Restrict major utility developments to the two utility corridors identified (Lands Map 3).	Restrict major utility developments to the two utility corridors identified (Lands Map 3) and allow an additional major powerline ROW as applicable with laws and values for which the SRBOP NCA was designated. Designate an additional corridor to include the existing 138 kV line and an additional 500 kV line.
Alternative 3	SEIS-21	9K	Utility and Communication Corridors – Restrict major utility developments to the two utility corridors identified (Lands Map 3).	Restrict major utility developments to the two utility corridors identified (Lands Map 3) and allow an additional major powerline ROW as applicable with laws and values for which the SRBOP NCA was designated. Designate an additional corridor to include a 500 kV line.
Alternative 4	SEIS-22	8G	Utility and Communication Corridors – Restrict major utility developments to the two utility corridors identified (Lands Map 3).	Restrict major utility developments to the two utility corridors identified (Lands Map 3) and allow an additional major powerline ROW as applicable with laws and values for which the SRBOP NCA was designated. Designate an additional corridor to include a 500 kV line.

3.3.1 Purpose and Need to Amend the SRBOP RMP

All routes for all Alternatives cross the SRBOP Planning Area. Route locations were developed to comply with WECC requirements and to protect significant resources to the greatest extent feasible. These include, but are not limited to, TES species, soil resources, cultural resources, and visual resources. The Project is not in conformance with the decisions in the SRBOP RMP and the plan would need to be amended. The planning regulations at 43 CFR 1601 provide a process to consider plan amendments for actions that are not in conformance with the plan.

Both Co-Preferred Alternatives would require amendments to the SRBOP RMP. Co-Preferred Alternative 2 utilizes Segment 8 of the Revised Proposed Route and the FEIS Proposed 9 (inclusive of the Toana Road Variation 1). Both of these routes cross the SRBOP outside of existing corridors and would be closer than 0.5 mile to occupied sensitive plant habitat. Co-Preferred Alternative 5 includes Routes 8G and 9K (inclusive of Toana Road Variation 1). These routes would cross the SRBOP 250 feet apart,

crossing outside of a designated corridor and within 0.5 mile of occupied sensitive plant habitat.

The Segment 8 Revised Proposed Route follows the same alignment as the FEIS Proposed Route for the first 91.4 miles. It then deviates from the FEIS Proposed Route alignment and would be 250 feet north of the existing Midpoint to Hemingway (Summer Lake) 500-kV line rather than 1,500 feet south of the line from the eastern boundary of the SRBOP (MP 99.7) to the Hemingway Substation. It would also cross the Snake River north of Guffey Butte, instead of south for the area as in the 2013 FEIS. This means that portions of the route would cross the SRBOP outside of the two designated corridors.

The Segment 9 Revised Proposed Route also crosses the SRBOP. This route is the same as the FEIS Proposed 9 for the first 95.6 miles, and then follows an alignment similar to the FEIS Route 9D/9G from MP 95.6 and 154.7, except that two portions of the route would be double-circuited with existing 138-kV lines within the SRBOP: the first, near C.J. Strike Reservoir and the Bruneau Arm (MP 106.2 to 109.3 and 109.9 to 112.1), and the other along Baja Road (MP 121 to 141.2). Several rebuilds totaling approximately 0.6 mile are also required to tie the existing 138-kV lines into the new double-circuit alignments.

The Segments 8 and 9 Revised Proposed Routes, FEIS Proposed 9, and Routes 8G, 8H, and 9K would cross the SRBOP outside of designated corridors, and cross multiple SRMAs, VRM Class II areas, and cultural resource areas.

The SRBOP RMP restricts utility development to two corridors. Portions of all routes cross the SRBOP outside of these corridors. RMP direction for Lands, Realty, and Utility Corridors states:

> "Restrict major utility developments to the two utility corridors identified." (Lands Map 3)

The RMP provides management direction for sensitive plants. Portions of all routes would cross occupied habitat for sensitive plants, with the Revised Proposed Routes for Segments 8 and 9 and Route 8H crossing the SRBOP for the longest distance of the routing options. EPMs would be followed (see Table 2.7-1 in the FEIS) to avoid or minimize negative impacts to these species or their habitat as required under Conservation Measure 3 – Ensure that new Federal actions support or do not preclude species conservation in slickspot peppergrass habitat (page 4 of the Conservation Agreement [CA]; A-67 of the SRPOB RMP):

> "b) If direct or indirect negative impacts to the species or its habitat are anticipated as a result of new BLM actions, the activity will be modified to avoid or minimize negative impacts and, where feasible, promote species conservation."

As this is in keeping with the RMP, no amendment is needed. However, the RMP also states:

> "Sensitive Plant Habitat. Include in all BLM authorizations permitting surface disturbing activities (non-grazing), requirements that (1) affected areas be

> reseeded with a perennial vegetative cover, and (2) surface disturbing activities be located at least 1/2 mile from occupied sensitive plant habitat."

The purpose of the draft amendments for Co-Preferred Alternatives 2 and 5 is to modify SRBOP RMP decisions utility corridors and sensitive plant habitat such that the granting of a ROW for construction of the Project would be in conformance with the RMP. The amendment for sensitive plants would also apply under all other Alternatives.

Under Alternatives 1, 3, 4, 6, and 7, routing for Segments 8 and 9 would cross outside of designated corridors and an amendment, similar to what would be proposed for the Co-Preferred Alternatives, would be needed.

The Segment 9 Revised Proposed Route and 8H would cross VRM Class II areas and would require an amendment to address this nonconformance. The existing Standard Operating Procedures under Section 2.17 (Utility and Communication Corridors) state:

> "VRM Class II management areas will not be available for utility corridors."

The SRBOP RMP has the objective of protecting the visual resources of historic areas with a secondary emphasis on the Snake River Canyon, with the following management action:

> "Manage the areas along the Oregon Trail and the Snake River Canyon as VRM Class II, the OTA as Class IV and remaining areas as Class III. [Visual Resource Management (VRM) Map] This will provide reasonable protection of the Oregon Trail and flexibility in managing the remainder of the NCA."
>
> "VRM Class II management areas will not be available for utility corridors."

The Class II designation for the Oregon Trail is again stated in Section 2.2 of the SRBOP RMP in the Cultural and Tribal Resources Management Actions (page 2-2):

> "Protect the Oregon Trail as a Visual Resource Management (VRM) Class II area. [Visual Resource Management (VRM Map)]"

The Segment 9 Revised Proposed Route and 8H would pass through the Snake River SRMA. This use is not in conformance with the SRMA designation based on "recreational, scenic or cultural values." The RMP includes the following restriction:

> "This SRMA consists of 22,300 acres in the Snake River Canyon downstream from Grandview, Idaho that is managed for the protection of cultural and scenic values." (2.14 Recreation 2-20).

The Segment 9 Revised Proposed Route and 8H would pass through C.J. Strike SRMA. This use is not in conformance with the SRMA designation based on "recreational, scenic or cultural values." The designation of the C.J. Strike SRMA is defined as:

> "C.J. Strike SRMA: This SRMA consists of 20,000 acres surrounding C.J. Strike Reservoir along the Snake River. The purpose of the SRMA is to provide enhanced recreation management associated with the reservoir, and protection of the Oregon Trail adjacent to the reservoir." (2.14 Recreation 2-20)

The RMP includes decisions that close areas to motorized vehicles. The Management Objective currently reads: "Provide motorized vehicle access to the majority of the NCA while reducing the number of unnecessary routes and increasing the non-motorized opportunities." Portions of the Segment 9 Revised Proposed Route would cross the Cove Non-Motorized Area. The SRBOP RMP states:

> "2.16 Transportation – Close the following areas to motorized vehicles: ... Cove – 1,600 acres (Transportation Map A-145)"

Amendments would be needed to modify the utility corridor, visual resource, motorized vehicle, SRMA, and sensitive plant restrictions such that the Project would be in conformance with the SRBOP RMP if Alternative 1, 6, or 7 was selected. If Alternative 3 or 4 is selected, amendments would be needed to modify utility corridor and sensitive plant restrictions.

3.3.2 Project Alternatives and Associated Routing

Revised Proposed Routes: The Revised Proposed Routes for Segments 8 and 9, and to a lesser extent Route 8G, Route 8H, FEIS Proposed 9, and Route 9K, would cross through the SRBOP Planning Area. These routes would follow similar alignments as the routes presented in the FEIS but with modifications to reduce impacts to important resources. The transmission lines would be constructed utilizing 500-kV single-circuit lattice steel towers between 145 and 180 feet tall as well as 500/138-kV double-circuit H-frame structures between 160 and 190 feet tall and would cross BLM-managed land covered by the SRBOP RMP. Several additional routes were considered along Segments 8 and 9, which are discussed in Chapter 2 of the SEIS and in the 2013 FEIS. The Revised Proposed Routes and the other routes are described in Chapter 2 of the SEIS, along with the reasons for considering these routes.

The Segment 8 Revised Proposed Route is similar to the original proposed route in the 2013 FEIS except that the line would be 250 feet north of the existing 500-kV line rather than 1,500 feet south of the line from the eastern boundary of the SRBOP (MP 99.7) to the Hemingway Substation. It would also cross the Snake River north of Guffey Butte, instead of south as in the FEIS. The first 91.4 miles of the route is unchanged from the FEIS Proposed Route.

The Segment 9 Revised Proposed Route includes a 139.8-mile single-circuit 500-kV transmission line and 25.5 miles of double-circuit 500/138-kV transmission line between the proposed Cedar Hill Substation near the county line between Cassia and Twin Falls Counties in Idaho and the Hemingway Substation. The Segment 9 Revised Proposed Route follows the same alignment as the FEIS Proposed 9 for 95.6 miles, and then follows an alignment similar to the FEIS Routes 9D/9G from MPs 95.6 and 154.7 (Route 8H would follow this part of the alignment as well), except that two portions of the route would be double-circuited with existing 138-kV lines within the SRBOP: the first, near C.J. Strike Reservoir and the Bruneau Arm (MPs 106.2 to 109.3 and 109.9 to 112.1), and the other along Baja Road (MPs 121 to 141.2). Several rebuilds totaling approximately 0.6 mile are also required to tie the existing 138-kV lines into the new double-circuit alignments. Except for minor variations, the route is unchanged from the FEIS Routes 9D/9G between MPs 141.2 and 154.7. The revised Segment 9 Proposed Route crosses the Snake River south of Sinker Butte, whereas the 2013 FEIS Proposed

Route did not cross the Snake River. From MP 154.7 to the Hemingway Substation, the route is the same as the FEIS Proposed Route. Route 8H follows the same alignment as the Segment 9 Revised Proposed Route through the SRBOP Planning Area.

Additional Routes: Under Co-Preferred Alternative 5, both Routes 8G and 9K would cross the SRBOP 250 feet apart and parallel to each other. Their alignment through the SRBOP is very similar to the alignment for Route 9E analyzed in the FEIS, and is the same as the alignment of the Revised Proposed Route for Segment 9 through this easternmost portion of the SRBOP (east of MP 95.6). Routes 8G, 9K, and FEIS Proposed 9 have varying configurations for different Alternatives, but have some degree of parallel routing of Segment 8 and Segment 9 combinations under Alternatives 4, 5, 6, and 7. Routes 8G and 9K cross the SRBOP just south of the WWE corridor at the eastern edge of the SRBOP, while the FEIS Proposed 9 crosses the SRBOP within the WWE corridor except for a small area near the town of Murphy.

No Action Alternative: The No Action Alternative analyzed in the SEIS is the predicted result of the denial of the applications. Under the No Action Alternative, Gateway West would not be constructed (no construction of the new substations, substation expansion, or the transmission line); therefore, no associated plan amendments would be required. The objectives of the Project, which include providing increased transmission capacity and a more reliable transmission line system for transport of energy, including wind energy, to meet existing and future needs (as described in EIS Section 1.4, Proponents' Objectives for the Project), would not be met.

3.3.3 Amendments to the SRBOP RMP Associated with the Co-Preferred Alternatives

Both Co-Preferred Alternatives would require amendments to the SRBOP RMP to be consistent with the land use plan. Co-Preferred Alternative 2 would require Amendments for the Segment 8 Revised Proposed Route and the FEIS Proposed 9. Co-Preferred Alternative 5 would require amendments for Routes 8G and 9K. All routes would require an amendment to the SRBOP RMP to allow surface disturbance from the Project within 0.5 mile of occupied sensitive plant habitat. Segment 8 of the Revised Proposed Route, FEIS Proposed 9, Route 8G, and Route 9K would require plan amendments for granting of a ROW for the Project across lands managed under the RMP. Amendments are proposed for Segment 8 of the Revised Proposed Route and FEIS Proposed 9 for Co-Preferred Alternative 2 (Figure F-4a), and Routes 8G and 9K for Co-Preferred Alternative 5 (Figure F-4b). The SRBOP RMP limits new utilities to existing corridors. FEIS Proposed 9 crosses the SRBOP within the WWE corridor on the east side then again near the town of Murphy, where it is just outside the corridor.

The Revised Proposed Route for Segment 8 (Co-Preferred Alternative 2 and Alternatives 1 and 3) would cross the SRBOP near other transmission lines at the northern end of the Planning Area, as well as through the western portion of the SRBOP, paralleling the existing 500-kV line (approximately 250 feet north of the existing line). An amendment would be required to cross the SRBOP outside of a designated corridor (see Figure F-4).

Draft Amendment SEIS-6 for the Revised Proposed Route for Segment 8 would amend the Utility and Communications Corridors Management action to allow development of this Project (changes in italics):

> "Restrict major utility developments to the two utility corridors identified and allow an additional *major powerline ROW as applicable with laws and values for which the SRBOP NCA was designated. Designate an additional corridor to include the existing Summer Lake 500-kV line and one additional 500-kV line.*"

FEIS Proposed 9 (Co-Preferred Alternative 2, and Alternatives 4 and 6) would cross the SRBOP outside of a designated corridor near the town of Murphy. An amendment would be required to cross this small section of the SRBOP outside of a designated corridor.

Draft Amendment SEIS-7 for FEIS Proposed 9 would amend the Utility and Communications Corridors Management action to allow development of this Project (changes in italics):

> "Restrict major utility developments to the two utility corridors identified and allow an additional *major powerline ROW as applicable with laws and values for which the SRBOP NCA was designated. Designate an additional corridor to include the one additional 500-kV line.*"

All routes would cross the SRBOP in areas where construction could affect slickspot peppergrass and its habitat in addition to other sensitive plant habitat. The RMP contains management direction restricting surface disturbance and project activity that would disturb this habitat. While potential impacts to slickspot peppergrass will be handled through the *Lepidium papilliferum* CA and consultation with the U.S. Fish and Wildlife Service, the Project would still not meet the distance requirements for all occupied sensitive plant habitat and an amendment would still be required.

Draft Amendment SEIS-8 for routes in Co-Preferred Alternative 2 (Revised Proposed Route for Segment 8 and FEIS Proposed 9), Co-Preferred Alternative 5 (Routes 8G and 9K), as well as the remaining routes (Revised Propose Route for Segment 9 and Route 8H) would amend the Sensitive Species decision and would read (changes in italics):

> "Sensitive Plant Habitat Include in all BLM authorizations permitting surface disturbing activities (non-grazing), requirements that (1) affected areas be reseeded with a perennial vegetative cover, and (2) surface disturbing activities be located at least 1/2 mile from occupied sensitive plant habitat. *Gateway West will be allowed within 0.5 mile of occupied, sensitive plant habitat, with appropriate mitigation to protect sensitive plants, including slickspot peppergrass.* (See Appendix F)"

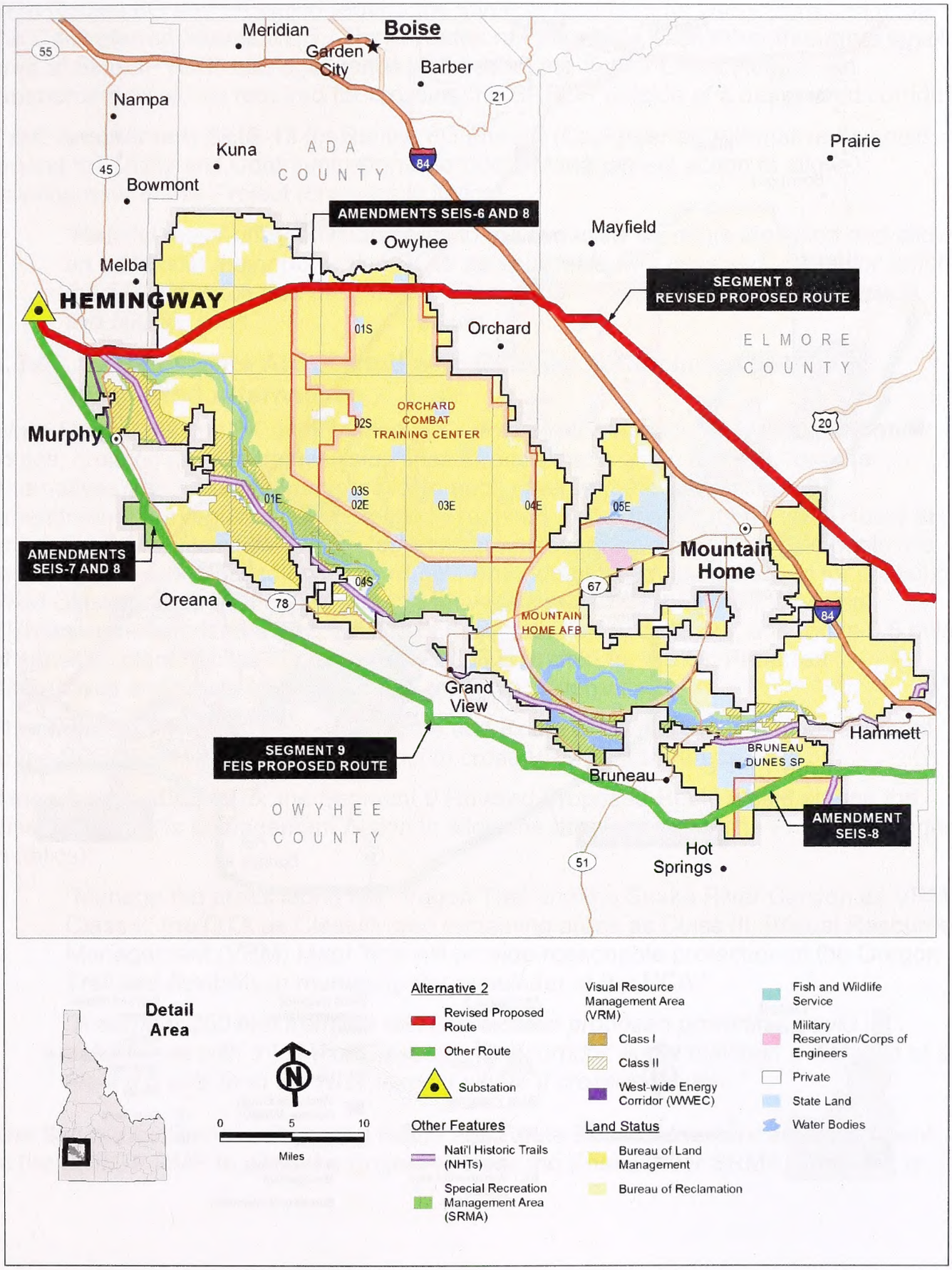

Figure F-4a. Locations of SRBOP RMP Amendments for Co-Preferred Alternative 2

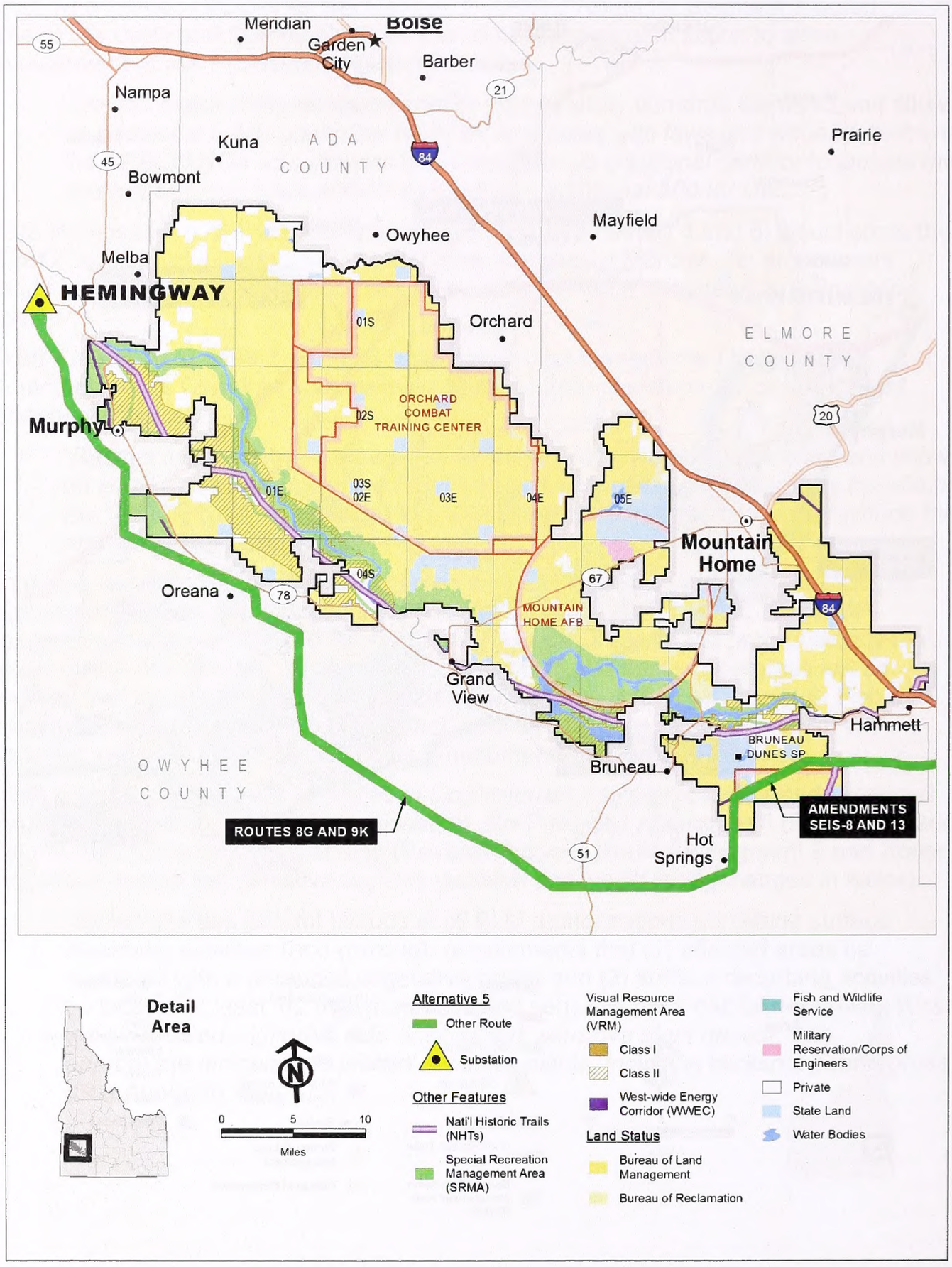

Figure F-4b. Locations of SRBOP RMP Amendments for Co-Preferred Alternative 5

Both Routes 8G and 9K would require the same amendment for Utility Corridors under the Co-Preferred Alternative 5. These routes run parallel to each other through a small area of SRBOP RMP-managed lands just west of the Saylor Creek Range. An amendment would be required for crossing the SRBOP outside of a designated corridor.

Draft Amendment SEIS-13 for Routes 8G and 9K (Co-Preferred Alternative 5) would amend the Utility and Communications Corridors Management action to allow development of this Project (changes in italics):

> "Restrict major utility developments to the two utility corridors identified and allow an additional *major powerline ROW as applicable with laws and values for which the SRBOP NCA was designated. Designate an additional corridor to include two 500-kV lines.*"

3.3.4 Amendments Associated with Routing not included in the Co-Preferred Alternatives

While Routes 8G and 9K are included in Co-Preferred Alternative 5 (which uses both routes, creating parallel transmission lines through much of the routing), for other Alternatives, the routes are not parallel to each other and therefore different amendments are required. The Revised Proposed Route for Segment 9 and Route 8H are not part of either of the Co-Preferred Alternatives, and additional amendments are required for areas crossed by these routes. Amendments would be needed for crossing VRM Class II areas associated with the Snake River and Oregon Trail, crossing SRMAs, non-motorized areas, outside of designated utility corridors, and within 0.5 mile of sensitive plant habitat. Amendment SEIS-8 is drafted for the Co-Preferred Alternatives and would also apply to all remaining Alternatives.

The Segment 9 Revised Proposed Route and Route 8H would require an amendment to the SRBOP RMP to allow the Project to cross VRM Class II areas.

Amendment SEIS-15 for the Segment 9 Revised Proposed Route would amend the Visual Resources Management Action to allow the development of the Project (changes in italics):

> "Manage the areas along the Oregon Trail and the Snake River Canyon as VRM Class II, the OTA as Class IV and remaining areas as Class III. [Visual Resource Management (VRM) Map] This will provide reasonable protection of the Oregon Trail and flexibility in managing the remainder of the NCA."
>
> *"A corridor 250 feet from the centerline of the proposed powerline would be established with a VRM of Class III. This corridor would maintain a distance of at least 0.5 mile from the NHT, except where it crosses the trail."*

The Segment 9 Revised Proposed Route and Route 8H would require an amendment to the SRBOP RMP to allow the Project to cross the Snake River SRMA. This use is

not in conformance with the SRMA designation based on "recreational, scenic or cultural values."

Amendment SEIS-16 would amend the Recreation Objectives and Management Actions to reduce the designated area of the SRMA such that the Project would be in conformance with the RMP (changes in italics).

> "Snake River Canyon SRMA – This SRMA consists of 22,300 acres in the Snake River Canyon downstream from Grandview, Idaho that is managed for the protection of cultural and scenic values.
>
> *Allow a 500-kV transmission line to cross the SRMA while protecting cultural resources from surface disturbance."*

The Segment 9 Revised Proposed Route and Route 8H would require an amendment to pass through C.J. Strike SRMA. This use is not in conformance with the SRMA designation based on "recreational, scenic or cultural values." An amendment to allow the project within the C.J. Strike SRMA would be needed for this alignment

Amendment SEIS-17 would amend the Recreation Objectives and Management Actions to reduce the designated area of the SRMA such that the Project would be in conformance with the RMP (changes in italics):

> "C.J. Strike SRMA – This SRMA consists of 20,000 acres surrounding C.J. Strike Reservoir along the Snake River. The purpose of the SRMA is to provide enhanced recreation management associated with the reservoir, and protection of the Oregon Trail adjacent to the reservoir.
>
> *Allow a 500-kV transmission line to cross the SRMA while protecting the Oregon Trail from surface disturbance."*

The Segment 9 Revised Proposed Route and Route 8H would require an amendment to the SRBOP RMP to construct the Project through VRM Class II managed areas.

Amendment SEIS-18 would amend Visual Resource Management Actions of the SRBOP RMP (changes in italics):

> *"VRM Class II areas associated with the Oregon Trail and Snake River that are in view of the 500-kV transmission line that would not meet VRM Class II objectives of the C. J. Strike SRMA would be reclassified to VRM Class III"*

The Segment 9 Revised Proposed Route and 8H would require an amendment to the SRBOP RMP to construct the Project through the Cove Non-motorized Area.

Amendment SEIS-19 would amend Transportation Management Actions of the SRBOP RMP, which closes 1,600 acres near Cove to motorized vehicles (changes in italics):

> "Close the following areas to motorized vehicles: ...Cove – 1,600 acres (Transportation Map A-145).
>
> *The area is closed to motorized vehicle use, subject to authorized use"*

Both Segment 9 of the Revised Proposed Route and Route 8H would require the same amendment for Utility Corridors. These routes have the same alignment through the SRBOP. An amendment would be required for crossing the SRBOP outside of a designated corridor.

Amendment SEIS-20 for Segment 9 of the Revised Proposed Route and 8H would amend the Utility and Communications Corridors Management action to allow development of this Project (changes in italics):

> "Restrict major utility developments to the two utility corridors identified and allow an additional *major powerline ROW as applicable with laws and values for which the SRBOP NCA was designated. Designate an additional corridor to include the existing 138kV line and one additional 500-kV line.*"

Routes 9K (Alternatives 3 and 7) and 8G (Alternative 4) would cross the SRBOP outside of designated corridors, west of Saylor Creek training area, and not parallel with each other. An amendment would be required to cross the SRBOP outside of a designated corridor.

Amendment SEIS-21 for Route 9K would amend the Utility and Communications Corridors Management action to allow development of this Project (changes in italics):

> "*Restrict major utility developments to the two utility corridors identified and allow an additional major powerline ROW as applicable with laws and values for which the SRBOP NCA was designated. Designate an additional corridor to include a 500-kV line.*

Amendment SEIS-22 for Route 8G would amend the Utility and Communications Corridors Management action to allow development of this Project (changes in italics):

> "Restrict major utility developments to the two utility corridors identified and allow an additional *major powerline ROW as applicable with laws and values for which the SRBOP NCA was designated. Designate an additional corridor to include a 500-kV line.*"

The Project would be microsited through the corridor to the extent feasible in order to reduce impacts to adjacent resources. Mitigation, including off-site compensatory mitigation, is discussed below.

The Segments 8 and 9 Revised Proposed Routes would pass through designated utility corridor and ROW Avoidance Area around a National Register Historic District. Multiple routing alternatives for passing through this area were evaluated in the FEIS. The Revised Proposed Route for Segment 8 crosses the northwestern tip of this area for approximately 0.5 mile, parallel to an existing 500-kV line. The Segment 9 Revised Proposed Route crosses through the middle of this area, heading west-northwest through the avoidance area after crossing the Snake River near the Swan Falls Dam. While it was determined that no amendment was required for this routing, significant mitigation measures and specific route determination would be required to avoid areas of cultural resources and traditional properties.

The purpose of the amendments associated with these routes would be to modify the utility corridor, visual resource, and sensitive plant restrictions such that the Project would be in conformance with the SRBOP RMP.

3.3.5 Affected Environment and Environmental Effects

The affected environment is discussed in Chapter 3 for each resource: Section 3.2.1 for visual resources, Section 3.3.1 for cultural resources, Section 3.6.1 for vegetation resources, Section 3.10.1 for wildlife resources, Section 3.11.1 for special status species, and Section 3.17.1 for recreation and land use.

The direct and indirect effects of this Project are discussed in Chapter 3 of the SEIS. Cumulative effects are discussed in Chapter 4. Refer to Sections 3.2.2.2 and 3.2.2.3 and Appendix G for an analysis of the effects on visual resources; Sections 3.3.3.3 and 3.3.3.4 for effects on cultural resources; Sections 3.6.2.2 and 3.6.2.3 for effects on vegetation; Sections 3.10.2.2 and 3.10.2.3 for effects on wildlife; Section 3.11.2.2 for effects on special status species; Section 3.15.2.3 for effects on soils; and Section 3.17.2.3 for effects on land use and recreation.

Approximately 25 miles of the Segment 9 Revised Proposed Route would cross within the boundaries of the SRBOP, approximately 15 miles of which would cross the SRBOP on BLM-administered land. The area that would be crossed is predominantly undeveloped and characterized by numerous draws and gulches with sparse vegetation. However, Segment 8 follows existing lines for the length of its route through the SRBOP, and Segment 9 follows existing lines for approximately half of its length in the SRBOP. Route 8H follows the same alignment as the Segment 9 Revised Proposed Route through the SRBOP. Much of the routes would be able to utilize existing road networks; however, some areas would require construction of new roads. Allowing the transmission line through this landscape would increase the human presence by occupation of infrastructure and creation of dedicated travel routes for construction and operations.

Routes 8G and 9K would cross the southeastern portion of the SRBOP within the Section 368 corridor (WWE corridor), but not a corridor designated in the RMP, for approximately 6.5 miles and then turn south, outside of the WWE corridor for 2.2 miles before re-entering the 2015 Jarbidge RMP Planning Area.

FEIS Proposed 9 would cross the southeastern portion of the SRBOP within the Section 368 corridor (WWE corridor), but not a corridor designated in the RMP, for approximately 7.7 miles. The alignment stays within the corridor for the majority of the remainder of the route. There is a small section near the town of Murphy that would be on BLM-managed land within the SRBOP and outside of a designated corridor for just under 1 mile (See Figure F-4a).

3.3.5.1 Effects of Amendments for Routes Associated with Co-Preferred Alternatives

Co-Preferred Alternative 2

Co-Preferred Alternative 2 would include Revised Proposed Route for Segment 8 and FEIS Proposed 9. Approximately 15 miles of the Revised Proposed Route for Segment 8 would cross the SRBOP on BLM-managed land, paralleling an existing 500-kV line.

This is not in a designated corridor, and creating a corridor would impact resource management objectives. FEIS Proposed 9 was analyzed in the 2013 FEIS. This route would cross the SRBOP in two locations. In the eastern end of the SRBOP, the route would cross BLM-managed land within the SRBOP within the Section 368 corridor (WWE corridor), but not within a corridor designated in the RMP. The route again enters the SRBOP south of the town of Murphy, within a designated corridor; however, approximately 1 mile of the route is on BLM-managed land outside of a designated corridor. The amendment (SEIS-7) would expand the area managed as utility corridors; however, the distance is short and utility corridors in the SRBOP are narrow (around 1,000 feet wide or less). Revised Proposed Route 8 would also cross the SRBOP in two locations. In the north, it would cross just north of an existing narrow corridor, and then would parallel the existing 500-kV line through the western portion of its route through the SRBOP. While this route would be 250 feet to the north of an existing line, a corridor was not designated for the existing line, so an amendment would be needed (SEIS-6). This would result in the designation of the land as a narrow corridor, which directly affects how the land within the corridor is managed.

The Segment 8 Revised Proposed Route avoids the majority of the Utility Avoidance area in the SRBOP, crossing it for less than three-tenths of a mile, before exiting the SRBOP to the west. While it was determined that an amendment was not needed for crossing the Utility Avoidance area, a description of the routing and implications is needed. The route would cross this small section, and the top of the Utility Avoidance Area, 250 feet north of the existing transmission line. This routing uses existing roads through the SRBOP for most of its length, and routing through the Utility Avoidance Area is required using this alignment to meet reliability requirements with the Segment 8 Revised Proposed Route. Approximately 9 miles of Revised Proposed 9/8H route (Alternatives 1, 6, and 7) would cross the Avoidance Area. An alternative that avoids this area has been developed for the SEIS, Route 8G, which avoids the majority of the SRBOP and would not cross the Utility Avoidance area. Allowing construction in the Utility Avoidance Area and in areas of high cultural importance, such as a National Register Historic District, could impact the ability to meet management objectives of protecting these areas and maintaining the cultural landscape. Potential impacts could include loss of historic artifacts, loss of historic character of the landscape, and diminished traditional cultural properties and resources. "Significant mitigation" would be required to limit these impacts as described in the SRBOP Record of Decision (pages 2-1 and 2-2), which could involve extensive cultural surveys, micrositing, data recovery, and on-site mitigation.

In addition to needing amendments for utility corridors, the routes for Co-Preferred Alternative 2 (Revised Proposed 8 and FEIS Proposed 9) would also require an amendment for allowing surface disturbance within 0.5 mile of occupied sensitive plant habitat (SEIS-8). As discussed in the amendment, this action would require surveys and on-site review to ensure disturbance is minimized. The sensitive plant direction was initiated to prevent further impacts to the survival of sensitive species and species of concern. This amendment could result in a need for more active management of affected habitats to ensure the intent of the management actions in the RMP are upheld.

Co-Preferred Alternative 5

Co-Preferred Alternative 5 would include Routes 8G and 9K. These routes run parallel, 250 feet from each other, through approximately 9 miles of the eastern portion of the SRBOP. Approximately 2.2 of those miles are outside of any designated corridor, while the remaining are within a Section 368 corridor (WWE corridor). Draft Amendment SEIS-14 permits the Project and establishes a narrow corridor for the routes in this area. While the effects at the location will be larger for this Alternative, compared to alternatives where only one route is located in this area, it should be noted that impacts such as surface disturbance would be reduced because the same roads can be used for either line. Impacts from amending the RMP to allow a transmission line outside of designated corridors are similar to those discussed above for FEIS Proposed 9, but limited to the location crossed at the southwest end of the SRBOP. Sensitive plants are located within 0.5 mile of the alignments for these alternatives and therefore construction within this boundary could increase risk of disturbance to these communities. Implementation of EPMs to identify and minimize disturbance where sensitive plants are located would reduce this risk.

3.3.5.2 Effects of Amendments for Routes not Associated with the Co-Preferred Alternatives

Alternative 1 includes the Revised Proposed Routes for Segments 8 and 9. Effects associated with the Revised Proposed Route for Segment 8 have already been discussed for Co-Preferred Alternative 2. Effects associated with Revised Proposed 9 are discussed below. Alternatives 6 and 7 would include Route 8H, which would be the same as Revised Proposed Route for Segment 9 within the SRBOP, and are discussed below.

Segment 9 Revised Proposed Route and 8H

The Revised Proposed Route for Segment 9 (Alternative 1) and Route 8H (Alternatives 6 and 7) would require the most amendments to the SRBOP RMP of any of the other routes.

Changing the VRM Class II designations and allowing the Project within the Snake River SRMA (Amendments SEIS-15 and SEIS-16, respectively) could affect the ability to meet the management plan objectives. Within the SRMAs, these Visual Resource objectives include protecting visual resources of historic areas. Changing the VRM class would reduce the level of protection for those areas being changed. The VRM areas proposed for reclassification to VRM Class III are within 250 feet of the route centerline, which would likely preclude additional major powerlines from being developed in the same area, due to separation requirements. The lower visual protection, however, could make it easier for other types of disturbance to the visual landscape to occur. The construction of the transmission line, if approved, would adversely affect the historic character of place where it is installed because it would dominate the landscape. Visitors to the Oregon Trail would be affected by the visual impact of a high-voltage transmission line within the proximity of the trail.

In the C.J. Strike SRMA, changing the VRM class would not be consistent with the management of those areas within the SRMA. The SRMA was established partially for scenic values associated with the Oregon Trail; therefore, the amendment to allow the

500-kV transmission line, while protecting the physical characteristics of the trail, is required to maintain consistency with the SRMA management in the revised RMP. While the transmission line would impact scenic values within the SRMA, maintaining the land within the SRMA allows the area to continue to be managed for recreational values and protection of the Oregon Trail through more concentrated management of the area.

While it was determined that an amendment was not needed for crossing the Utility Avoidance Area, a description of the routing and its effects is needed to explain how this will affect management in this area. The routing up to Salmon Falls Dam follows the existing transmission line through the southern portion of the SRBOP. This routing uses existing roads through the SRBOP for most of its length, and routing through the Utility Avoidance Area is needed to take advantage of these existing infrastructure, which helps reduce overall impacts to the SRBOP from the Project. This routing is proposed in conjunction with Revised Proposed 8 (Alternative 1), FEIS Proposed 9 (Alternative 6), or Route 9K (Alternative 7) to meet the Proponents' reliability requirements. Routes 8G, 9K, and FEIS Proposed 9 all avoid this area. Co-Preferred Alternative 2 and Alternative 3 include the Segment 8 Revised Proposed Route, which crosses the avoidance area for less than half a mile, parallel to an existing line. Co-Preferred Alternative 5 and Alternative 4 avoid this management area, utilizing Routes 8G, 9K, and FEIS Proposed 9. Allowing construction in the Utility Avoidance Area and in areas of high cultural importance, such as a National Register Historic District, could impact the ability to meet management objectives of protecting these areas and maintaining the cultural landscape. Potential impacts could include loss of historic artifacts, loss of historic character of the landscape, and diminished traditional cultural properties and resources. "Significant mitigation" would be required to limit these impacts as described in the SRBOP Record of Decision 2-1, which could involve extensive cultural surveys, micrositing, data recovery, and on-site mitigation.

Amending the RMP to close the Cove Non-Motorized Area to motorized use, subject to authorized use (SEIS-19), allows for authorized actions within this area. This allows for emergency actions as well as the construction of the Project without changing the general management strategy for the area. This area was designated to allow restoration of the landscape. Allowing motorized use in the Cove Non-Motorized Areas could impact the ability of meeting goals for landscape restoration. Careful planning of motorized use for Project construction and maintenance access in these areas can reduce the negative effects. Construction within slickspot peppergrass suitable habit will require surveys to ensure occupied habitat is not disturbed, in accordance with the CA. Micrositing and thorough surveys would be required to avoid damage to populations near the construction and operations areas (TESPL-4).

The SRBOP RMP contains conservation measures for the protection of slickspot peppergrass and its habitat. Slickspot peppergrass was listed as threatened under the Endangered Species Act in 2009, but the listing was remanded by the Idaho District Court in 2012 (see Section 3.7.1.5 of the FEIS); however, the BLM's management of the species has not changed. All routes would cross potential and occupied sensitive plant habitat within the SRBOP; therefore, the RMP and associated CA for occupied habitat would apply. While the project would be evaluated under the CA as well as

through consultation with U.S. Fish and Wildlife Service, an amendment would still be needed (SEIS-8), as the Project is unlikely to be able to remain 0.5 mile or more from occupied habitats at all times. The Project includes EPMs to protect natural resources (see Table 2.7-1 in the FEIS). Specific EPMs are included to protect slickspot peppergrass habitat, which involve surveys for plants within 50 feet of construction prior to ground disturbance in all three BLM categories of slickspot peppergrass habitat, not constructing within 50 feet of identified plants or known previously occupied areas, limiting disturbance, and using appropriate methods for soil storage and seeding during reclamation activities (TESPL-4).

Because the SRBOP was designated, in large part, to protect raptor species, any impacts to raptors could affect the ability of the SRBOP to meet their management goals. The towers and conductors would be constructed following Avian Power Line Interaction Committee recommendations in avian habitat (WILD-3). Mitigation measures such avoiding guyed towers where possible (TESWL-11 and WILD-6), and installing anti-collision devices where required could further lower the impacts to raptor species (WILD-6 and WILD-7).

Mitigation measures designed to reduce adverse impacts are summarized in Table 2.7-1 of the FEIS. The Proponents have developed an MEP that contains design features specific to the SRBOP. This plan was developed to mitigate the effects of Project-related impacts within the SRBOP, as well as comply with the SRBOP's enabling statute (P.L. 103-64) which requires enhancement of resources within the SRBOP. A description of the MEP is in Chapter 2 and the effects analysis is discussed by resource in Chapter 3 of this SEIS. The BLM identified additional measures that could be conducted in addition to those proposed in the Proponents' MEP in order to compensate for Project-related residual impacts as well as enhance the resources that the SRBOP was established to manage. The BLM's additional measures are described in the Chapter 3 resource effects analysis.

The degree to which these measures are adopted will affect how implementation of the RMP amendments would affect the ability of the SRBOP to be managed according to the reason for its creation. Plan amendments that would reduce the level of protection for certain areas, such as around the Snake River and Oregon Trail, directly impact the ability to meet goals for land protection. In addition, crossing areas that are specifically designated to not permit road construction or transmission lines would affect management goals for which those prohibitions were designated. Implementation of enhancement measures would reduce the overall degradation to the resources in the SRBOP from the project and therefore improve the ability of the SRBOP to be managed according to the RMP goals and objectives.

Routes 8G, 9K, and FEIS Proposed 9

While these routes were discussed for the Co-Preferred Alternatives, it is worth discussing the difference between the effects of amending the RMP for the Co-Preferred Alternatives versus the other Alternatives. An amendment is drafted for allowing two parallel lines (8G and 9K) to cross the SRBOP under Co-Preferred Alternative 5. These parallel lines would deviate from the designated corridor south of the Bruneau Dunes, creating a corridor with two parallel lines, 250 feet apart. In Alternative 4, only one route, Route 8G, would follow this route, while FEIS Proposed 9

would utilize the Section 368 corridor (WWE corridor) through this area of the SRBOP. Amending the RMP to allow the routes in this alternatives would therefore result in utilizing two different corridors through a short section of the eastern SRBOP, as well as the effects of FEIS Proposed 9 outside of the corridor near Murphy. Alternative 3 would utilize the Revised Proposed Route of Segment 8 and Route 9K. Only one transmission line would be permitted outside of the corridor in the southeast section of the SRBOP whereas Alternative 5 would have two parallel lines. However, Alternative 3 would also have the impacts described above for Revised Proposed Route of Segment 8. Alternative 7 would have the same Segment 9 effects as Alternative 3 (using Route 9K), but would also have the same effects as described above for Revised Proposed 9, as it shares the same alignment with 8H through the SRBOP. Alternative 6 would have the same Segment 9 effects as Co-Preferred Alternative 2, but would also include effects described for Alternative 1, and 6 regarding routing of 8H through the NCA.

Alternative Comparison

Alternative 1 would include the most disturbance within the SRBOP. This Alternative includes impacts from both Revised Proposed Routes. As discussed in Section 3.3.5.1, the Revised Proposed Route for Segment 8 follows the existing Summer Lake line for much of its route through the SRBOP. This alignment minimizes disturbance to new areas, and enables the Project to use more existing infrastructure (such as roads for the existing transmission line); however, it would create new ground disturbance through a larger portion of the SRBOP than Route 8G, and result in two parallel transmission lines through the NCA in this area. While the Revised Proposed Route for Segment 9 would also follows the alignment of an existing line, it would do so for only part of the route through the SRBOP and would result in changing an existing 138-kV line into a double-circuit line for part of its route, which would increase the visual disturbance in the area. This route crosses multiple areas managed for visual resources and amendments would decrease the ability to manage to these resource objectives. The western portion of the route would cross an area with no existing transmission lines and sensitive Oregon Trail and other historic management objectives.

Alternative 3 would have similar effects in the SRBOP as Co-Preferred Alternative 2 because it would include the Segment 8 Revised Proposed Route and Route 9K. Amendment effects would differ for Segment 9 in that the 9K route crosses the SRBOP outside existing corridors at the east side of the NCA, while FEIS Proposed 9 (used in Co-Preferred Alternative 2) is within the Section 368 corridor (WWE corridor) in that area and is not outside of the corridor until it crosses near Murphy.

Alternative 4 would have similar effects in the SRBOP as Co-Preferred Alternative 5. Similar to Alternative 5, this Alternative would avoid crossing the northern and western portion of the SRBOP that is crossed by the Segment 8 Revised Proposed Route. Unlike Co-Preferred Alternative 5, however, the routes would not be parallel where they do cross the SRBOP. This results in two different areas being crossed at the eastern edge of the NCA, as well as the crossing of the NCA by FEIS Proposed 9 near the town of Murphy.

Alternatives 6 and 7 have very similar effects in the SRBOP. Route 8H is used in both Alternatives, resulting in a need for the same amendments required for the Segment 9

Revised Proposed Route. As discussed for Alternative 1, these amendments could affect the ability to manage visual and cultural resources to the level currently desired.

3.4 Bennett Hills/Timmerman Hills MFP Draft Amendments

The Bennett Hills/Timmerman Hills MFP[7] provides direction for management of public land under the jurisdiction of the Shoshone Field Office in south-central Idaho. The Bennett Hills/Timmerman Hills MFP Planning Area consists of approximately 892,000 acres in Blaine, Camas, Elmore, Gooding, and Lincoln Counties and guides actions such as the granting of ROW under Title V of FLPMA. The MFP includes management objectives and recommendations for scenic and cultural resources. The proposed crossing of the Oregon NHT would impact visual resources and archeological resources; thus, the proposed Project would not be in conformance with the Bennett Hills/Timmerman Hills MFP. An amendment would be needed if any Alternative containing the Segment 8 Revised Proposed Route is selected (Alternatives 1 through 3). Since Co-Preferred Alternative 2 contains the Segment 8Revised Proposed Route, amendments are drafted for the Bennett Hills/Timmerman Hills MFP (see Table F-4).

Table F-4. Draft Amendments for the Bennett Hills/Timmerman Hills MFP

Affected Alternatives	Number	Affected Route	Existing MFP Direction	Draft Amendment
Co-Preferred Alternative 2 Alternative 1 Alternative 3	SEIS-9	Revised Proposed 8	REC 4.1 – No management activity should be allowed to cause any evident changes in the form, line, color, or texture that is characteristic of the landscape within this Class II area.	The VRM Class II area within 3,000 feet to the north of the existing transmission line ROW will be reclassified to VRM III (including the existing ROW).
Co-Preferred Alternative 2 Alternative 1 Alternative 3	SEIS-10	Revised Proposed 8	REC 14.6 – Prohibit all land disturbing developments and uses on archeological sites.	Manage all cultural resources with applicable laws and policies.

3.4.1 Purpose and Need to Amend the Bennett Hills/Timmerman Hills MFP

Co-Preferred Alternative 2, Alternative 1, and Alternative 3 include the Revised Proposed Route for Segment 8. The alignment for the Segment 8 Revised Proposed Route through the area managed under the Bennett Hills/Timmerman Hills MFP has not changed from the alignment analyzed in the 2013 FEIS. Approximately 21 miles of the Segment 8 Revised Proposed Route would cross through the Bennett Hills/Timmerman Hills Planning Area, approximately 15 miles of which would be on BLM-managed lands. This route would cross 6.3 miles of VRM Class II lands as well as crossing the Oregon NHT. The location of the Proposed Route was identified to comply with WECC

[7] BLM. 1980. Bennett Hills/Timmerman Hills Management Framework Plan. BLM Shoshone Field Office, U.S. Department of Interior.

requirements and to protect important resources to the greatest extent feasible. These resources include, but are not limited to, threatened and endangered plants, wildlife, sensitive lands, and archeological and visual resources.

Because the Project does not conform to the Bennett Hills/Timmerman Hills MFP, land use plan amendments would be needed if the Segment 8 Revised Proposed Route is selected. The planning regulations at 43 CFR 1601 provide for a process to consider plan amendments for actions that are not in conformance with the plan.

The Bennett Hills/Timmerman Hills MFP management objective REC 4.1 for visual resources is to "manage the visual resources within the Planning Area in conformance with the guidance in BLM Manual 6310.18B-E." The recommendation for achieving this follows:

> "No management activity should be allowed to cause any evident changes in the form, line color or texture that is characteristic of the landscape within this Class II area."

The decision for meeting the objective is to use the above recommendation as "guidance for the Class II areas, utilizing concealment, repetition of elements, minimizing surface disturbance, etc., to meet the goal" (Bennett Hills-Timmerman Hills MFP; Recreation 4.1). Draft Amendment SEIS-9 addresses the Project's nonconformance with the guidance in the Bennett Hills Timmerman Hills MFP regarding REC 4.1.

The Bennett Hills/Timmerman Hills MFP Management Objective for cultural resources is to "identify, evaluate, and manage cultural resources in the Bennett Hills-Timmerman Hills Planning Units" (Bennett Hills-Timmerman Hills MFP; Recreation R-14). The management recommendation, REC 14.6, for Class I archaeological resources, emphasizes the following:

> "Prohibit all land disturbing developments and uses on archeological sites."

Draft Amendment SEIS-10 addresses the Project's nonconformance with the guidance in the Bennett Hills Timmerman Hills MFP regarding REC 14.6.

The purpose of the draft amendment is to 1) modify the VRM class designation for areas along existing transmission line ROWs and 2) modify limitations protecting the Oregon NHT. These amendments would allow the Project to conform to the Bennett Hills/Timmerman Hills MFP if the Segment 8 Revised Proposed Route is selected.

3.4.2 Project Alternatives and Associated Routing

The Segment 8 Revised Proposed Route follows the FEIS Proposed Route for the first 91.4 miles, including the area through the Bennett Hills/Timmerman Hills Planning Area. Segment 8 of the Proposed Route is a single-circuit 500-kV transmission line that would link the Midpoint and Hemingway Substations. The transmission lines would be constructed utilizing 500-kV single-circuit lattice steel towers between 145 and 180 feet tall and would cross BLM-managed land covered by the Bennett Hills/Timmerman Hills MFP. Several alternative segments, including the routes evaluated in the 2013 FEIS (Proposed Route, BLM-Preferred Route, and additional routes) were considered. The Revised Proposed Route is described in Chapter 2 of the SEIS, along with the reasons for considering this route and other routes considered but not assessed in detail or

previously assessed in the FEIS. Appendix A, Figure A-1 of the SEIS shows the Segment 8 Revised Proposed Route.

Revised Proposed Route: The Segment 8 Revised Proposed Route (Co-Preferred Alternative 2 and Alternatives 1 and 3) enters lands managed by the Bennett Hills/Timmerman Hills MFP north of Tuttle and east of Bliss, Idaho. The route is located in a northwesterly direction, spans approximately 21 miles of the southwest corner of the Bennett Hills/Timmerman Hills management area, and parallels an existing 230-kV transmission line. The route is located south of the Pioneer Reservoir, crosses the Gooding County/Elmore County line, and leaves the Bennett Hills/Timmerman Hills management area east of King Hill. An amendment would be needed if the Co-Preferred Alternative 2, Alternative 1, or Alternative 3 were selected.

Additional Routes:

Route 8G would not cross land managed under the Bennett Hills/Timmerman Hills MFP; therefore, no amendment would be needed to the Bennett Hills/Timmerman Hills MFP if an Alternative containing this route (Co-Preferred Alternative 5 and Alternative 4) were selected.

Route 8H would not cross land managed by the Bennett Hills/Timmerman Hills MFP, and therefore no amendments would be needed for this MFP for Alternatives containing this route (Alternatives 6 and 7). This route would, however, cross through the SRBOP, and multiple amendments would be required for that RMP.

No Action Alternative: The No Action Alternative analyzed in the SEIS is the predicted result of the denial of the applications. Under the No Action Alternative, Gateway West would not be constructed (no construction of the new substations, substation expansion, or the transmission line); therefore, no associated plan amendments would be required. The objectives of the Project, which include providing increased transmission capacity and a more reliable transmission line system for transport of energy, including wind energy, to meet existing and future needs (as described in Section 1.4, Proponents' Objectives for the Project), would not be met.

3.4.3 Draft Plan Amendments to the Bennett Hills/Timmerman Hills MFP

The Co-Preferred Alternative 2 includes the Segment 8 Revised Proposed Route. The Segment 8 Revised Proposed Route, if selected, would require a plan amendment to the Bennett Hills/Timmerman Hills MFP for granting of a ROW for the Project across lands managed by the Shoshone Field Office. Amendments are drafted for Segment 8 Revised Proposed Route for Co-Preferred Alternative 2 (Figure F-5). The Bennett Hills/Timmerman Hills MFP protects visual and archeological resources. These protections would be rewritten to allow development of this Project.

The route would cross land managed as VRM Class II. A 500-kV transmission line would not conform to this VRM Classification and an amendment would be needed.

Draft Amendment SEIS-9 for the Segment 8 Revised Proposed Route would amend the visual resource protection in this area to allow development of this Project:

> "The VRM Class II area within 3,000 feet to the north of the existing transmission line ROW will be reclassified to VRM III (including the existing ROW)."

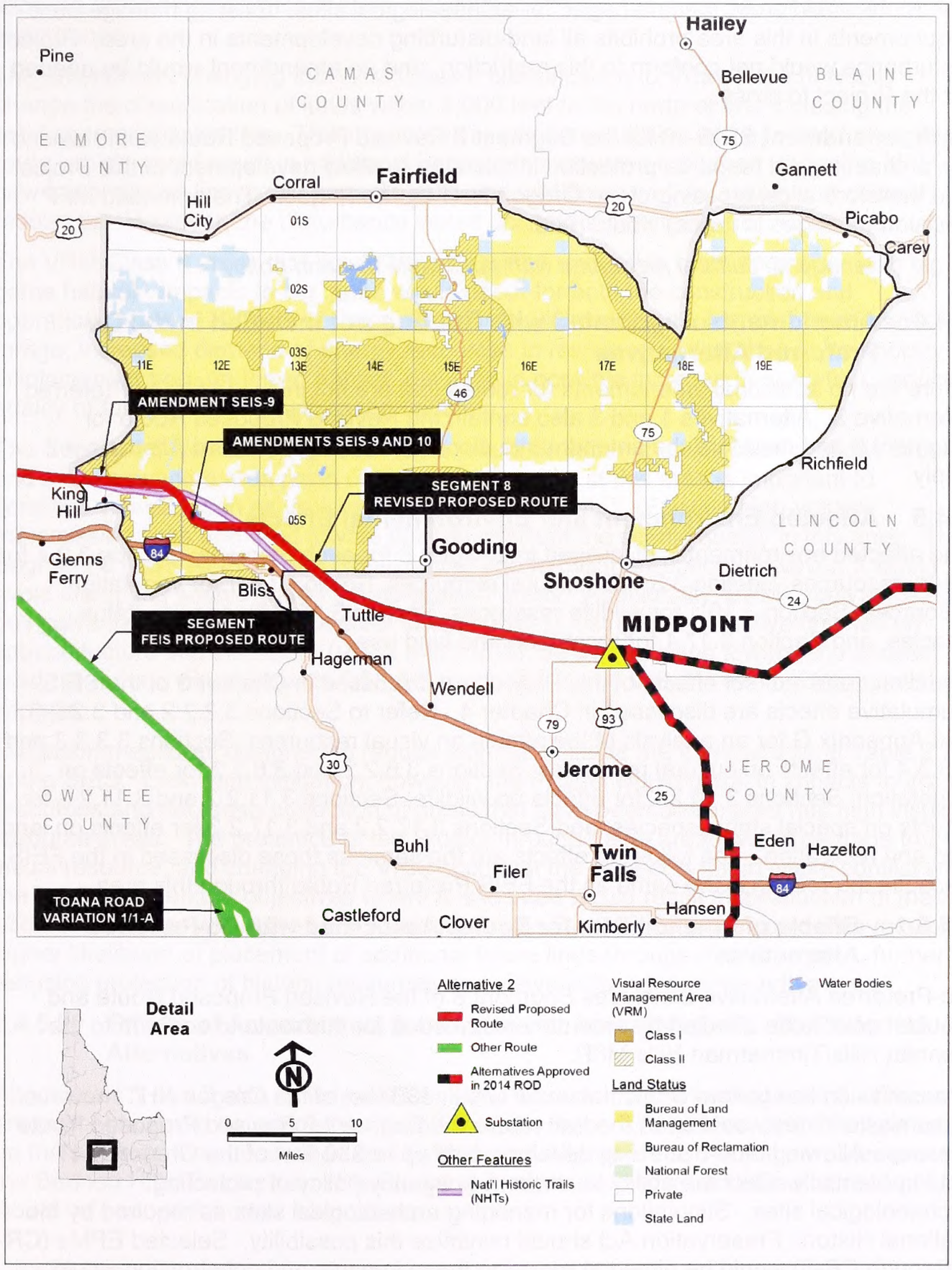

Figure F-5. Locations of Bennett Hills/Timmerman Hills MFP Amendments for Co-Preferred Alternative 2

The route would cross land managed for archaeological sites. Existing management requirements in this area prohibits all land-disturbing developments in the area. Project disturbance would not conform to this restriction, and an amendment would be needed for the Project to cross.

Draft Amendment SEIS-10 for the Segment 8 Revised Proposed Route would amend the archaeological resource protection in this area to allow development of this Project and therefore allow crossing of the Oregon NHT by the Project. The amended MFP decision (changes in italics) would read:

"*Manage all cultural resources with applicable law and policy.*"

3.4.4 Amendments Associated with Routing not included in the Co-Preferred Alternatives

There are no additional amendments for routes that are not included for Co-Preferred Alternative 2. Alternatives 1 and 3 also contain the Revised Proposed Route for Segment 8 and therefore the amendments discussed for Co-Preferred Alternative 2 apply.

3.4.5 Affected Environment and Environmental Effects

The affected environment is discussed in Chapter 3 for each resource: Section 3.2.1 for visual resources, Section 3.3.1 for cultural resources, Section 3.6.1 for vegetation resources, Section 3.10.1 for wildlife resources, Section 3.11.1 for special status species, and Section 3.17.1 for recreation and land use.

The direct and indirect effects of this Project are discussed in Chapter 3 of the SEIS. Cumulative effects are discussed in Chapter 4. Refer to Sections 3.2.2.2 and 3.2.2.3 and Appendix G for an analysis of the effects on visual resources; Sections 3.3.3.3 and 3.3.3.4 for effects on cultural resources; Sections 3.6.2.2 and 3.6.2.3 for effects on vegetation; Sections 3.10.2.2 for effects on wildlife; Sections 3.11.2.2 and 3.11.2.3 for effects on special status species; and Sections 3.17.2.2 and 3.17.2.3 for effects on land use and recreation. The following effects are the same as those discussed in the FEIS because the routing is the same as the FEIS Preferred Route through this area.

3.4.5.1 Effects of Amendments for Routes Associated with Co-Preferred Alternatives

Co-Preferred Alternative 2 includes Segment 8 of the Revised Proposed Route and would therefore be affected by amendments needed for this route to conform to the Bennett Hills/Timmerman Hills MFP.

Transmission line towers would not occur within 330 feet of the Oregon NHT; however, transmission lines would span the trail where the Segment 8 Revised Proposed Route crosses. Allowing land-disturbing developments up to 330 feet of the Oregon NHT could potentially affect the ability to conform to agency policy of protecting archaeological sites. Stipulations for managing archeological sites as required by the National Historic Preservation Act should minimize this possibility. Selected EPMs (CR-1 through CR-8) would be aimed at reducing these impacts and construction would occur in a manner that would avoid disturbing important historic resources; however,

allowing ground disturbance in such proximity increases the potential for archaeological disturbance.

The amendment changing the VRM Class II classification to VRM Class III would change the classification of lands within 3,000 feet to the north of and including the existing transmission line. This may result in additional utilities being located along this route, which would result in additional impacts to resources managed under the MFP. A new transmission line would impact plants and wildlife as well as scenic and cultural resources. However, the disturbance would occur in a previously disturbed area.

The VRM Class II areas that would be reclassified under this amendment are also big game habitat. Impacts to big game would occur for both the construction and operations phases. Effects of these activities could result in avoidance of preferable forage, increased demand of energy resources in response to disturbance, temporary displacement from preferred habitat, resulting in possible increase in predation, reduced quality of forage, and impacts to reproduction.

The Segment 8 Revised Proposed Route would be within the viewshed of Kings Crown and the surrounding area north of King Hill. Scenery in this area is important to sensitive viewers such as visitors along the Oregon NHT. Existing high-voltage transmission lines and wind towers already interrupt the scenic quality in this area. The Segment 8 Revised Proposed Route would add to this interruption; however, it would avoid disrupting scenic quality in undisturbed areas. Additionally, EPMs such as using dull galvanized finish on lattice steel towers (VIS-1), using non-reflective finishes on subconductors and insulators (VIS-2 and VIS-9), as well as siting towers and access roads to reduce visual impacts (VIS-5 through VIS-7 and VIS-11) will minimize visual impacts.

Mitigation measures designed to reduce adverse impacts are summarized in Table 2.7-1 of the SEIS. Even with mitigation, however, the Project would result in impacts to visual resources and decrease protection of areas that have been designated has high visual resource areas. The presence of the Project through these areas would degrade this visual resource, and changing the VRM such that the Project is not in visual conflict with the land management objectives where it is located would result in a reduction of these VRM Class areas within the MFP Planning Area. This MFP change could also result in higher likelihood of placement of additional future lines through the same area, further reducing protection of historic resources and viewsheds in the surrounding area.

3.4.5.2 Effects of Amendments for Routes not Associated with Co-Preferred Alternatives

Alternatives 1 and 3 also include the Revised Proposed Route for Segment 8. The same amendments would be needed to this MFP under these Alternatives, and effects would be the same as those described for Co-Preferred Alternative 2. No other routes cross the Bennett Hills/Timmerman Hills Planning Area; therefore, no additional amendments would be needed for other Alternatives.

3.5 Kuna MFP Draft Amendment

The Kuna MFP,[8] approved on March 22, 1983, guides actions that occur within its Planning Area on lands managed by the Four Rivers Field Office, including the granting of ROW under Title V of FLPMA. The MFP confines new ROW to existing corridors, and has management requirements for visual and cultural resources. The Project would not be consistent with these requirements and thus is not consistent with the Kuna MFP. An amendment would be needed if any Alternative containing the Revised Proposed Route for Segment 8 is selected (i.e., Alternatives 1 through 3). Since the Co-Preferred Alternative 2 contains the route, an amendment is drafted for the Kuna MFP (see Table F-5)

Table F-5. Draft Amendment for the Kuna MFP

Affected Alternatives	Number	Affected Route	Existing MFP Direction	Draft Amendment
Co-Preferred Alternative 2 Alternative 1 Alternative 3 Alternative 6 Alternative 7	SEIS-11	Revised Proposed 8, Revised Proposed 9/ 8H	L-4.1 – Confine major new utility R/Ws (i.e., 500 kV or larger or 24-inch pipeline) to existing corridors, as shown on Overlay L-4. The R/Ws will be subject to reasonable stipulations to protect other resource uses.	L-4.1 – Confine major new utility R/Ws (i.e., 500 kV or larger or 24-inch pipeline) to existing corridors as shown on Overlay L-4. The R/Ws will be subject to reasonable stipulations to protect other resource uses. *Amend Overlay L-4 to add a major transmission line (500 kV) right-of-way.*

3.5.1 Purpose and Need to Amend the Kuna MFP

The Segment 8 Revised Proposed Route (Co-Preferred Alternative 2 and Alternatives 1 and 3) and a small portion of Segment 9 Revised Proposed Route/8H would cross through the Kuna Planning Area. The Kuna MFP includes management objectives for many resources including lands, minerals, range management, watershed, wildlife, visual, cultural, recreation, and transportation support. Management Actions being drafted for amendment are those for "Lands," "Visual," and "Cultural" resources. The route locations for the Project were developed to comply with WECC requirements and to protect resources to the greatest extent feasible.

Because the Project does not conform to the current direction provided in the Kuna MFP for cultural resources and following existing corridors, the land use plan would need to be amended if the Segment 8 Revised Proposed Route is selected. The planning regulations at 43 CFR 1601 provide a process to consider plan amendments for actions that are not in conformance with the plan.

The Segment 8 Revised Proposed Route would cross the Kuna MFP management are outside existing corridors. An amendment would be needed if the Segment 8 Revised Proposed Route is selected. Draft Amendment SEIS-11 addresses the Project's

[8] BLM. 1983. Kuna Management Framework Plan. BLM Four Rivers Field Office, U.S. Department of Interior.

nonconformance with the management direction in the Kuna MFP. The Kuna MFP L-4.1 emphasizes the following with regard to utility ROWs:

> "Confine major new utility R/Ws (i.e., 500KV or larger or 24-inch pipeline) to existing corridors, as shown on Overlay L-4. The R/Ws will be subject to reasonable stipulations to protect other resource uses."

This amendment would also be needed for a small section of land crossed by the Segment 9 Revised Proposed Route/8H alignment, just south of the SRBOP.

The Segment 8 Revised Proposed Route would cross the Oregon Short Line Railroad within the Kuna MFP management area. An amendment to the Kuna MFP was evaluated for the 2013 FEIS routing through lands managed under Kuna MFP regarding the CRM 2.1 management direction for cultural resources. This management direction requires a ¼-mile corridor around the Union Pacific Railroad and management of specific historic sites for cultural resources. Further review determined that an amendment was not necessary for the effects of the Project action on this management direction.

3.5.2 Project Alternatives and Associated Routing

The Segment 8 Revised Proposed Route follows the Proposed Route from the FEIS for the first 91.4 miles. The Segment 8 Revised Proposed Route is a single-circuit 500-kV transmission line that would link the Midpoint and Hemingway Substations. Approximately 63 miles of the Segment 8 Revised Proposed Route are within the Kuna MFP boundaries. The transmission lines would be constructed utilizing 500-kV single-circuit lattice steel towers between 145 and 180 feet tall and would cross BLM-managed land covered by the Kuna MFP.

Several alternative segments, including the routes evaluated in the 2013 FEIS (Proposed Route, BLM-Preferred Route, and other routes) were considered. The Segment 8 Revised Proposed Route is described in Chapter 2 of the SEIS, along with the reasons for considering this route and other routes considered but not assessed in detail or previously assessed in the FEIS. Appendix A, Figure A-2 of the SEIS shows the Segment 8 Revised Proposed Route.

Revised Proposed Route: The Segment 8 Revised Proposed Route enters the Kuna MFP in Elmore County, southeast of Mountain Home, and proceeds in a general northwesterly direction, before heading through the SRBOP, paralleling an existing line. For much of this distance, the route follows the WWE corridor. Starting at MP 87.1, the route exits the WWE corridor and crosses VRM Class III and Class IV land in a west-northwesterly direction, to meet back up with and parallel the existing 500-kV line. The route would exit BLM-managed land in the Kuna MFP Planning Area near MP 99.7.

Additional Routes: A small section of land still managed under the Kuna MFP is crossed by the alignment for Segment 9 of the Revised Proposed Route/8H, just south of the SRBOP. Routes 8G, 9K, and FEIS Proposed 9 cross land south of the SRBOP. Routes 8H and 9K would cross through the southern portion of the SRBOP. These routes cross land managed under the SRBOP RMP and other management plans. No amendment would be needed to the Kuna MFP if an alternative including two of these routes is selected.

No Action Alternative: The No Action Alternative analyzed in the SEIS is the predicted result of the denial of the applications. Under the No Action Alternative, Gateway West would not be constructed (no construction of the new substations, substation expansion, or the transmission line); therefore, no associated plan amendments would be required. The objectives of the Project, which include providing increased transmission capacity and a more reliable transmission line system for transport of energy, including wind energy, to meet existing and future needs (as described in SEIS Section 1.4, Proponents' Objectives for the Project), would not be met.

3.5.3 Amendments to the Kuna MFP RMP Associated with the Co-Preferred Alternatives

Co-Preferred Alternative 2 includes the Segment 8 Revised Proposed Route. The Segment 8 Revised Proposed Route would require a plan amendment to the Kuna MFP (Figure F-6). This draft amendment would allow the granting of a ROW for the Project across lands managed by the Four Rivers Field Office. The Kuna MFP limits new ROWs to existing corridors. This limitation would be rewritten to allow development of this Project. The intent of the amendment is to allow the current Project but not to create a corridor that would facilitate additional major utilities.

Draft Amendment SEIS-11 for the Segment 8 Revised Proposed Route (for Co-Preferred Alternative 2) would amend the current Lands decision to permit the Project in this area. The amended decision (changes in italics) would read:

> "L-4.1– Confine major new utility R/Ws (i.e., 500 KV or larger or 24-inch pipeline) to existing corridors as shown on Overlay L-4. The R/Ws will be subject to reasonable stipulations to protect other resource uses. *Amend Overlay L-4 to add a major transmission line (500-kV) right of way.*"

There is currently a management objective for managing cultural and historic ruins near the area for the Segment 8 Revised Proposed Route.

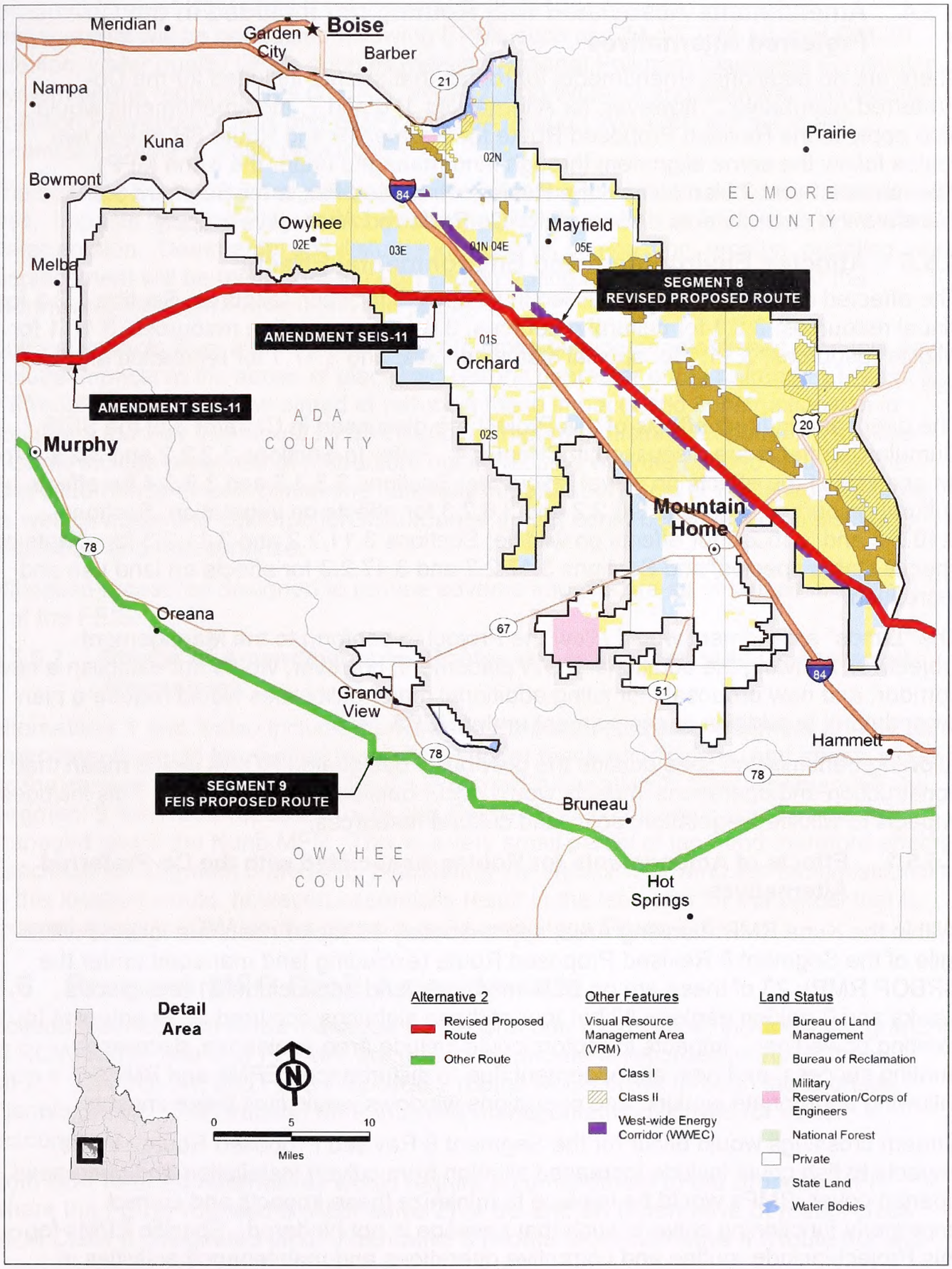

Figure F-6. Locations of Kuna MFP Amendment for Co-Preferred Alternative 2

3.5.4 Amendments Associated with Routing not included in the Co-Preferred Alternatives

There are no additional amendments for routes that are not included for the Co-Preferred Alternative 2; however, for Alternatives 1, 6 and 7, the amendments would also apply to the Revised Proposed Route for Segment 9 and Route 8H (these two routes follow the same alignment through land managed under the Kuna MFP). Alternatives 1 and 3 also contain the Revised Proposed Route for Segment 8 and therefore the amendments discussed for Co-Preferred Alternative 2 apply.

3.5.5 Affected Environment and Environmental Effects

The affected environment is discussed in Chapter 3 for each resource; Section 3.2.1 for visual resources, 3.3.1 for cultural resources, 3.6.1 for vegetation resources, 3.10.1 for wildlife resources, 3.11.1 for special status species, and 3.17.1 for recreation and land use.

The direct and indirect effects of this Project are discussed in Chapter 3 of the SEIS. Cumulative effects are discussed in Chapter 4. Refer to Sections 3.2.2.2 and 3.2.2.3 for an analysis of the effects on visual resources; Sections 3.3.3.3 and 3.3.3.4 for effects on cultural resources; Sections 3.6.2.2 and 3.6.2.3 for effects on vegetation; Sections 3.10.2.2 and 3.10.2.3 for effects on wildlife; Sections 3.11.2.2 and 3.11.2.3 for effects on special status species; and Sections 3.17.2.2 and 3.17.2.3 for effects on land use and recreation.

The "Lands" amendment would allow the Project to conform to the Management Objective. Allowing the additional ROW placement, however, would not establish a new corridor, and new proposals for siting additional major utility lines would require a plan amendment, in addition to assessment under NEPA.

Allowing transmission lines outside the previously designated ROWs would mean that construction and operations impacts would occur outside these corridors. This includes impacts to wildlife, vegetation, soils, and cultural resources.

3.5.5.1 Effects of Amendments for Routes Associated with the Co-Preferred Alternatives

Within the Kuna RMP Planning Area, approximately 46 raptor nests are located within 1 mile of the Segment 8 Revised Proposed Route (excluding land managed under the SRBOP RMP); 23 of these are on BLM-managed land and include 21 ferruginous hawks and 2 golden eagles. All but four of these sightings occurred at, or adjacent to, existing powerlines. Impacts to raptors could include area avoidance, decreased hunting success, and nest abandonment due to disturbance. EPMs and BMPs following appropriate working and operations windows would limit these impacts.

Stream crossings would occur for the Segment 8 Revised Proposed Route. While impacts to fish could include increased siltation from culvert installation and decreased riparian cover, BMPs would be in place to minimize these impacts and correct improperly functioning culverts such that passage is not hindered. Specific EPMs for this Project include routine and corrective operations and maintenance activities in streams with sensitive fish species such as culvert installation, bank stabilization, and ford location throughout the year (OM-16). Culverts on BLM-administered land will be

designed to meet BLM Gold Book Standards (FISH-1). Riparian vegetation management will be conducted following EPMs such as OM-17, OM-19, and OM-20. In addition, water quality EPMs such as meeting National Pollutant Discharge Elimination System permit requirements (WQA-1, WQA-2, and WQA-3) and following Stormwater Pollution Prevention Plans and BMPs (WQA-4 through WQA-12) will avoid and minimize impacts to water resources.

The soils for Segment 8 are generally susceptible to erosion with a low tolerance to soil loss. Impacts from the Project include compaction, as well as soil loss due to wind and water erosion. Detrimental soil disturbance such as compaction, erosion, puddling, and displacement will be minimized through implementing measures identified in the Stormwater Pollution Prevention Plan (SOIL-4).

Cultural impacts from allowing the Project to cross outside of established corridors could include impacts to the sense of place and historic character of the railroad. EPMs (CR-1 through CR-8) would be aimed at reducing these impacts and construction would occur in a manner that would avoid disturbing important historic resources. Possible impacts include presence of a structure not in keeping with the historic nature of the site, disturbance of land containing culturally important artifacts or landscape features, as well as noise and construction disturbance during construction, decommissioning, and repair and maintenance.

Mitigation measures designed to reduce adverse impacts are summarized in Table 2.7-1 of the FEIS.

3.5.5.2 Effects of Amendments for Routes not Associated with Co-Preferred Alternatives

Alternatives 1 and 3 also include the Revised Proposed Route for Segment 8. The same amendments would be needed to this MFP under these Alternatives, and effects would be the same as those described for Co-Preferred Alternative 2. The alignment for the Segment 9 Revised Proposed Route and Route 8H also crosses a small parcel still managed under the Kuna MFP. This is a very small parcel of land and therefore effects described for Segment 8 are likely overstating the impact. Allowing the transmission line in this location would, however, essentially result in the land-use for the parcel that is crossed being a ROW, as the parcel is quite small (see Figure F-6).

3.6 Bruneau MFP Draft Amendments

Actions that occur on lands managed by the Bruneau Field Office, including the granting of ROW under Title V of FLPMA, are guided by decisions recorded in the Bruneau MFP.[9] The 8G, 9K, and FEIS Proposed 9 routes would cross through the Bruneau Planning Area. The Bruneau MFP includes management objectives for visual resources.

Both Co-Preferred Alternatives would require an amendment to the Bruneau MFP where the FEIS Proposed 9 (Alternative 2) or 8G and 9K (Alternative 5) routes cross VRM Class II designated land. Alternative 3 (Route 9K), Alternative 4 (Route 8G and

[9] BLM. 1983. Bruneau Management Framework Plan.

FEIS Proposed 9), Alternative 6 (FEIS Proposed 9), and Alternative 7 (Route 9K) would also require a plan amendment to the Bruneau MFP (see Table F-6). An amendment is drafted for FEIS Proposed 9 for Co-Preferred Alternative 2 (see Figure F-7a) and for Routes 8G and 9K for Co-Preferred Alternative 5 (see Figure F-7b)

No amendments to the Bruneau MFP are currently suggested for the Segment 9 Revised Proposed Route (Alternative 1) or Route 8H (Alternatives 6 and 7), which follow the same alignment, along an existing transmission line through the SRBOP for the majority of the routing in this area.

Table F-6. Draft Amendment for the Bruneau MFP

Affected Alternatives	Number	Affected Routes	Existing MFP Direction	Draft Amendment
Co-Preferred Alternative 2 **Co-Preferred Alternative 5** Alternative 3 Alternative 4 Alternative 6 Alternative 7	SEIS-12	FEIS Proposed 9/ 8G/9K	VRM-1.2: Designate 136,000 acres as VRM Class II where activities are designed and located to blend into the natural landscape and not visually apparent to the casual visitor	The area designated as VRM Class II adjacent to Castle Creek will be reclassified to VRM Class III.

3.6.1 Purpose and Need to Amend the Bruneau MFP

As stated above, both of the Co-Preferred Alternatives contain routes that would cross the Bruneau Planning Area and would cross VRM Class II managed lands. This action would not conform to VRM Class II management objectives, and therefore an amendment would be required to reclassify this area. Route 8G, Route 9K, and FEIS Proposed 9 would cross the Planning Area and would cross VRM Class II lands near Castle Creek.

The Segment 9 Revised Proposed Route would cross a very small portion of land managed under the Bruneau MFP. Crossing this area would be consistent with the management objectives and therefore no amendment to the Bruneau MFP would be needed for this alignment.

This action would not conform to VRM Class II management objectives, and therefore an amendment would be required to reclassify this area.

3.6.2 Project Alternatives and Associated Routes

Portions of the Segment 9 Revised Proposed Route and Route 8H (Alternatives 1, 6, and 7) would cross through the Bruneau MFP Planning Area for less than a mile. In comparison, over 30 miles of the 8G, 9K, and FEIS Proposed 9 would cross through the Planning Area.

These routes are described in Chapter 2 of the SEIS, along with the reasons for considering these routes and other routes considered but not assessed in detail or previously assessed in the FEIS. Appendix A, Figure A-4 of the SEIS shows the Segment 9 Revised Proposed Route.

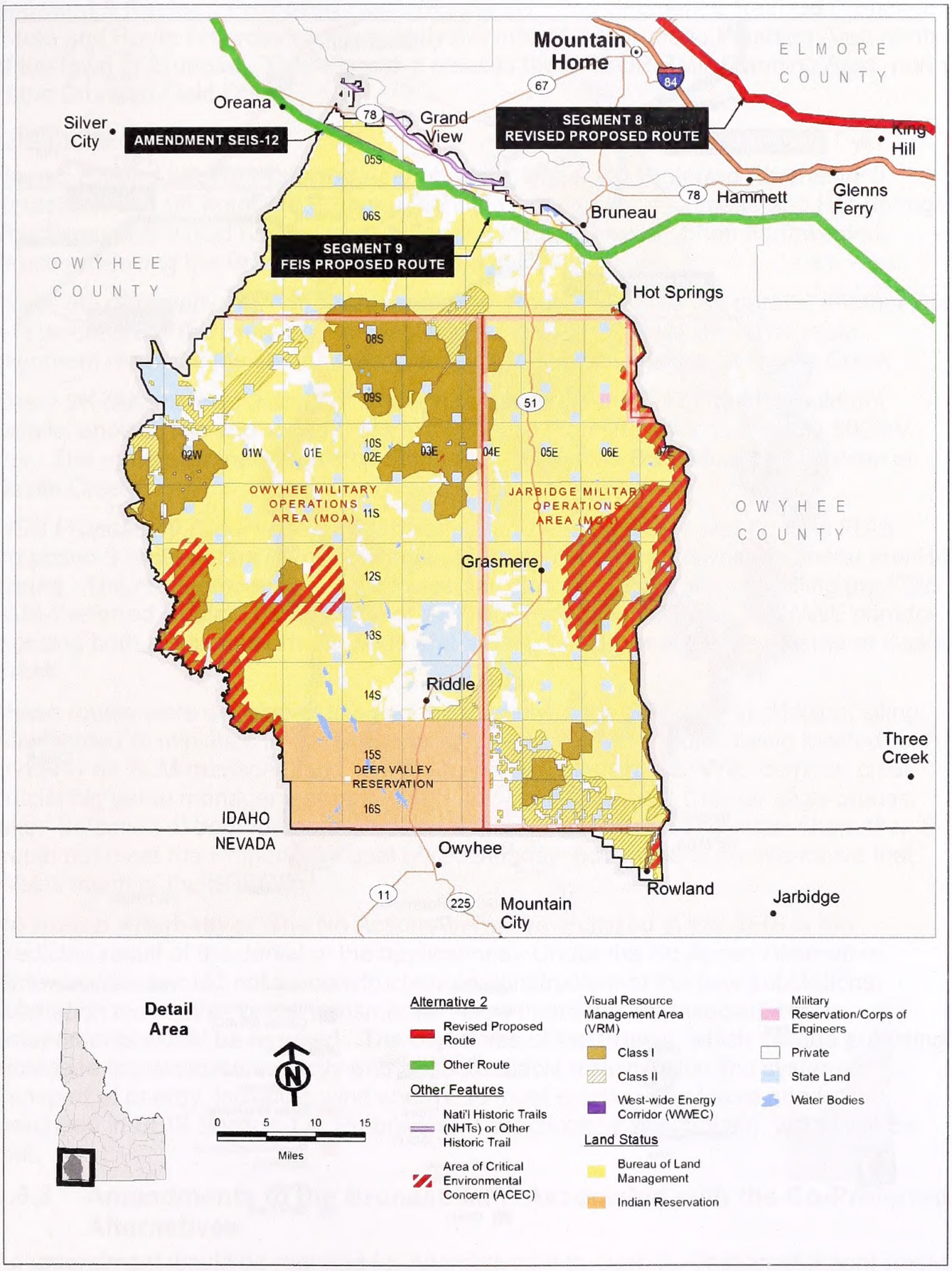

Figure F-7a. Location of Bruneau MFP Amendment for Co-Preferred Alternative 2

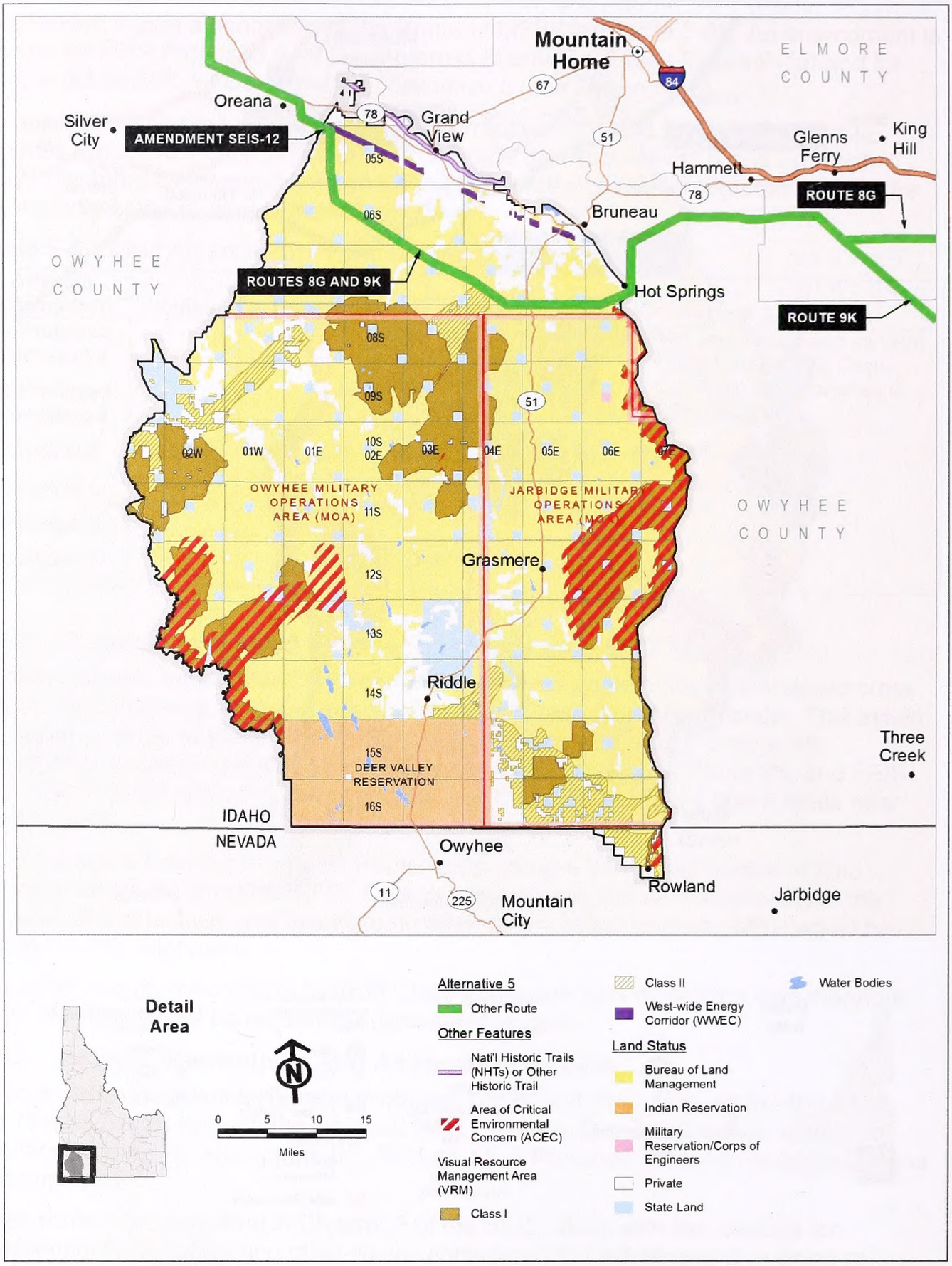

Figure F-7b. Location of Bruneau MFP Amendment for Co-Preferred Alternative 5

Segment 9 Revised Proposed Route/Route 8H: The Segment 9 Revised Proposed Route and Route 8H cross approximately 0.8 mile of the Bruneau Planning Area north of the town of Bruneau. This alignment crosses the SRBOP RMP Planning Area, north of the Bruneau Field Office.

Additional Routes:

Routes 8G and 9K (Co-Preferred Alternative 5): Under Co-Preferred Alternative 5, Routes 8G and 9K enter the Bruneau Planning Area south of Bruneau and Hot Springs. The alignments would parallel each other and follow a westerly then northwesterly direction, leaving the Bruneau Planning Area at Castle Creek.

Route 8G (Alternative 4): Under Alternative 4, Route 8G would not parallel another line and would cross the Bruneau Planning area as a single 500-kV line. The route alignment would be the same, leaving the Bruneau Planning Area at Castle Creek.

Route 9K (Alternatives 3 and 7): Under Alternatives 3 and 7, Route 9K would not parallel another line and would cross the Bruneau Planning area as a single 500-kV line. The route alignment would be the same, leaving the Bruneau Planning Area at Castle Creek.

FEIS Proposed 9 (Co-Preferred Alternative 2 and Alternatives 4 and 6): The FEIS Proposed 9 route enters into the Bruneau Management Area between Bruneau and Hot Spring. The route proceeds in a northwesterly direction, generally paralleling the FEIS BLM-Preferred Route. The majority of the FEIS Proposed 9 follows the WWE corridor, crossing both public and private lands and leaving the Bruneau Planning Area at Castle Creek.

These routes were developed to avoid the majority of the SRBOP. In addition, siting was located to minimize Project impacts on private land, the routes being located primarily on BLM-managed land. These routes are outside the WWE corridor, cross crucial big game management range, and are located to avoid Greater sage-grouse leks. Selection of both routes (as would be the case under Co-Preferred Alternative 5) would not meet the Proponents' goal of redundancy, but provides an alternative that avoids much of the SRBOP.

No Action Alternative: The No Action Alternative analyzed in the SEIS is the predicted result of the denial of the applications. Under the No Action Alternative, Gateway West would not be constructed (no construction of the new substations, substation expansion, or the transmission line); therefore, no associated plan amendments would be required. The objectives of the Project, which include providing increased transmission capacity and a more reliable transmission line system for transport of energy, including wind energy, to meet existing and future needs (as described in SEIS Section 1.4, Proponents' Objectives for the Project), would not be met.

3.6.3 Amendments to the Bruneau MFP Associated with the Co-Preferred Alternatives

An amendment would be required for Alternatives 2 through 7. This amendment would apply to the FEIS Proposed 9, 8G, and 9K routes. This amendment is drafted for both Co-Preferred Alternatives 2 and 5. The Bruneau MFP currently restricts impacts to

visual resources. Routes 8G, 9K, and FEIS Proposed 9 would cross an area of approximately 281 acres just south of the WWE corridor classified as VRM Class II for 0.3, 0.4, and 0.1 mile, respectively; therefore, an amendment to the MFP to allow impacts to visual resources would be needed if any of these routes is selected.

The Bruneau MFP emphasizes the following with regard to visual resources:

- **VISL Objective #1**: Manage all public lands in a manner which will protect and maintain the existing visual qualities, provide for enhancement where consistent with management policies, and provide for rehabilitation of land which presently do not meet the visual quality standards of surrounding lands. Use VRM contrast rating and project application design process for all management activities without unduly reducing commodity production or limiting program effectiveness.
- **VRM-1.2:** Designate 136,000 acres as VRM Class II where activities are designed and located to blend into the natural landscape and not visually apparent to the casual visitor.

Route 8G, Route 9K, and FEIS Proposed 9 would cross a parcel designated as VRM Class II near Castle Creek. The recently completed Visual Resources Inventory recognizes this parcel as VRM Class III for inventory purposes. With these factors in mind, the visual resource restrictions would be rewritten to reclassify the area.

Draft Amendment SEIS-12 for Route 8G, Route 9K, and FEIS Proposed 9 would amend this MFP. The amended restriction for visual resource impacts (changes in italics) would read:

> *The area designated as VRM Class II adjacent to Castle Creek will be reclassified to VRM Class III.*

This would reduce the area managed as VRM Class II by approximately 281 acres. The purpose of the amendment would be to modify the visual restrictions, such that the granting of a ROW for construction of the Project would be in conformance with the Bruneau MFP.

3.6.4 Amendments to the Bruneau MFP Not Included in the Co-Preferred Alternatives

Alternatives 3, 4, 6, and 7 all contain routes that would cross through the Bruneau MFP Planning Area and require an amendment to change the VRM Classification. This amendment is the same as the amendment for the Co-Preferred Alternatives, discussed above. There are no amendments to the Bruneau MFP associated with the Segment 8 Revised Proposed Route or Segment 9 Revised Proposed Route/Route 8H.

3.6.5 Affected Environment and Environmental Effects

The affected environment is discussed in Chapter 3 for each resource: Section 3.2.1 for visual resources, Section 3.3.1 for cultural resources, Section 3.6.1 for vegetation resources, Section 3.10.1 for wildlife resources, Section 3.11.1 for special status species, and Section 3.17.1 for recreation and land use.

The direct and indirect effects of this Project are discussed in Chapter 3 of the SEIS. Cumulative effects are discussed in Chapter 4. Refer to Section 3.2.2 and Appendix G

for an analysis of the effects on visual resources; Sections 3.3.3 and Appendix J, Section 6.2 for effects on cultural resources; Section 3.6.2 for effects on vegetation; Section 3.10.2 for effects on wildlife; Section 3.11.2 for effects on special status species; and Section 3.17.2 for effects on land use and recreation. The following effects are similar to those discussed in the FEIS because the routing is similar to Route 9E in the 2013 FEIS.

3.6.5.1 Effects of Amendments Associated with the Co-Preferred Alternatives

Reclassifying the VRM Class II parcel to VRM Class III would allow the transmission line to conform to the Bruneau MFP. More than half of the area of this parcel is within the WWE corridor. The routing for Segment 9 of the Co-Preferred Alternative 2 (FEIS Proposed 9) through this area is within the WWE corridor, while Routes 8G and 9K (Co-Preferred Alternative 5) are just south of the corridor. Reclassifying this parcel to VRM Class III would facilitate siting additional transmission lines in the WWE corridor, which would add to cumulative effects in the area. Indeed, selection of Co-Preferred Alternative 5 would result in two parallel 500-kV transmission lines within the reclassified parcel, which would have a greater visual effect than Co-Preferred Alternative 2 or any of the other Alternatives crossing the parcel. This Alternative does, however, avoid most of the impacts to the SRBOP.

The direct effects of amending the MFP to allow the Project include the disruption of form, line, texture, and color of the existing landscape. Construction and operations of a high-voltage transmission line would impact wildlife and other resources as described in the SEIS. Discussion with the BLM Bruneau Field Office personnel and a review of the 2012 Visual Resource Inventory indicated that it was felt this area was considered to have the visual resource qualities consistent with VRM Class III. This amendment would therefore be consistent with VISL Objective #1, but would reduce the VRM Class II designation in VRM-1.2. This reduction would be necessary because managing for a transmission line would not conform to VRM Class II management objectives. The presence of one or two high-powered transmission lines would not blend into the natural landscape and would be apparent to the casual observer (see Appendix G for a discussion of the visual impacts).

However, following the guidance of Objective #1, the re-evaluation of visual resources that was conducted in the 2012 Visual Resource Inventory indicates reclassifying this land to VRM Class III would still meet the objective of using VRM contrast ratings for management activities.

3.6.5.2 Effects of Amendments for Routes not Associated with the Co-Preferred Alternatives

Routing for Alternatives 3, 4, 6, and 7 results in the same amendment to the Bruneau MFP being needed, as is discussed above for the Co-Preferred Alternatives. Therefore the effects of this amendment would be similar to those discussed above. The direct effect from the Project of reclassifying the Class II area near Castle Creek to VRM Class III would differ across the routes, however, as different routes would be constructed, depending on the action alternative selected. Under Co-Preferred Alternative 2, and Alternatives 3, 6, and 7, only one Project route would be constructed through this area as a result of the amendment. Under Co-Preferred Alternative 5 and Alternative 4, two

routes would be constructed. In Alternative 4, this would result in one route in the WWE corridor and one route south of the corridor. In Co-Preferred Alternative 5, this would result in two routes being constructed 250 feet apart, just south of the WWE corridor.

Appendix G

VRM Amendment Analysis

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ACRONYMS AND ABBREVIATIONS

ACEC	area of critical environmental concern
AOI	area of inconsistency
BLM	Bureau of Land Management
FEIS	Final Environmental Impact Statement
Gateway West	Gateway West Transmission Line Project
GIS	geographic information system
IDT	Interdisciplinary Team
KOP	Key Observation Point
kV	kilovolt
LRT	Linear Routing Tool
MEP	Mitigation and Enhancement Portfolio
MFP	management framework plan
MP	milepost
NHT	National Historic Trail
ORV	outstandingly remarkable value
Project	Gateway West Transmission Line Project
Proponents	Rocky Mountain Power and Idaho Power
RMP	resource management plan
ROW	right-of-way
SEIS	Supplemental Environmental Impact Statement
SR	State Route
SRBOP	Morley Nelson Snake River Birds of Prey National Conservation Area
SRMA	Special Recreation Management Area
US	U.S. Highway
VCR	visual contrast rating
VRI	Visual Resource Inventory
VRM	Visual Resource Management
WSA	Wilderness Study Area
WSR	Wild and Scenic River
WWE	West-wide Energy

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1 INTRODUCTION

This document provides an analysis of locations where visual resource management–driven amendments to Bureau of Land Management (BLM) resource management plans (RMPs) and/or management framework plans (MFPs) may be necessary for additional routing options for Segments 8 and 9 of the Gateway West Transmission Line Project (Gateway West or Project) discussed in the Supplemental Environmental Impact Statement (SEIS). Gateway West consists of 10 segments between the Windstar Substation at Glenrock, Wyoming, and the Hemingway Substation approximately 30 miles southwest of Boise, Idaho. This document reviews routing for Segments 8 and 9 (both in Idaho) as developed for the SEIS (see Figure 1-1).

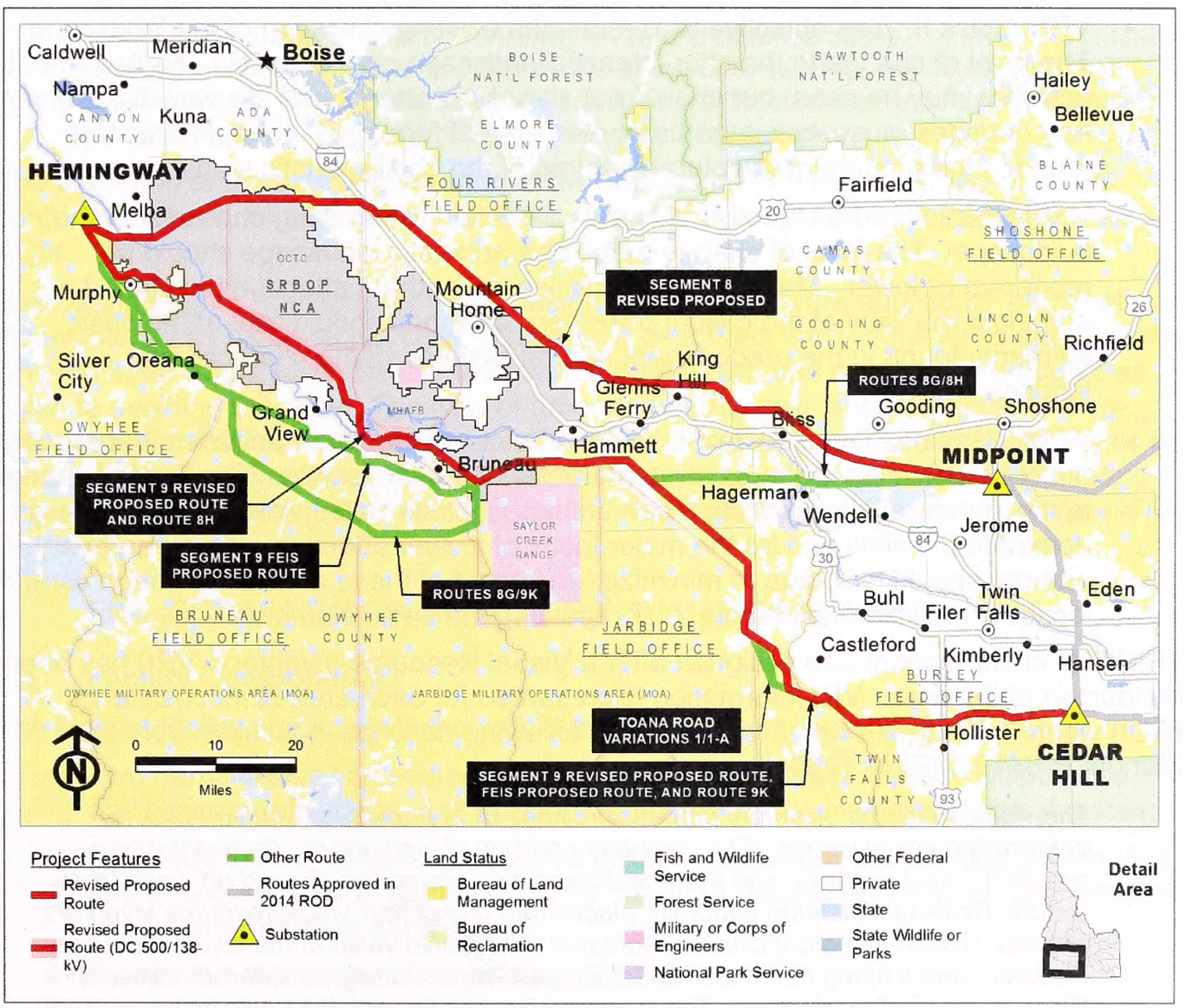


Figure 1-1. Project Overview

The transmission line would cross several BLM district and field offices. Activities on BLM-managed land are governed by direction found in individual RMPs and MFPs. These lands are subject to visual resource management objectives as developed using the BLM Visual Resource Management (VRM) System (BLM 1984) and are presented

in the RMP or MFP. The BLM system identifies four VRM Classes (I through IV) with specific management prescriptions for each class. The system is based on an inventory of the existing scenic quality, viewer sensitivity, and viewing distance zones. The management class for a given area is typically arrived at by comparing the scenic quality, visual sensitivity, and distance zone with the overall goals set forth for the area. The objectives of each VRM classification from the VRM Visual Resource Inventory Manual are stated below:

- VRM Class I. The objective is to preserve the existing character of the landscape. This class provides for natural ecological changes; however, it does not preclude very limited management activity. The level of change to the characteristic landscape should be very low and must not attract attention.
- VRM Class II. The objective is to retain the existing character of the landscape. The level of change to the characteristic landscape should be low. Management activities may be seen, but should not attract the attention of the casual observer. Any changes must repeat the basic elements of form, line, color, and texture found in the predominant natural features of the characteristic landscape.
- VRM Class III. The objective is to partially retain the existing character of the landscape. The level of change to the characteristic landscape should be moderate or lower. Management activities may attract attention but should not dominate the view of the casual observer. Changes should repeat the basic elements found in the predominant natural features of the characteristic landscape.
- VRM Class IV. The objective is to provide for management activities that require major modification of the existing character of the landscape. The level of change to the characteristic landscape can be high. These management activities may dominate the view and be the major focus of viewer attention. However, every attempt should be made to minimize the impact of these activities through careful location, minimal disturbance, and repeating the basic elements.

The VRM classifications are assigned after a Visual Resource Inventory (VRI) has been conducted of the area. VRI information is presented for each area of inconsistency (AOI) where information was available. The following description is taken from BLM Manual H-8410-1 (BLM 1986a):

> *The visual resource inventory process provides BLM managers with a means for determining visual values. The inventory consists of a scenic quality evaluation, sensitivity level analysis, and a delineation of distance zones. Based on these three factors, BLM-administered lands are placed into one of four visual resource inventory classes. These inventory classes represent the relative value of the visual resources. Classes I and II being the most valued, Class III representing a moderate value, and Class IV being of least value. The inventory classes provide the basis for considering visual values in the resource management planning (RMP) process…*
>
> *…Scenic quality is a measure of the visual appeal of a tract of land. In the visual resource inventory process, public lands are given an A, B, or C rating based on the apparent scenic quality which is determined using seven key factors: landform, vegetation, water, color, adjacent scenery, scarcity, and cultural modifications…*

> *...The planning area is subdivided into scenic quality rating units for rating purposes. Rating areas are delineated on a basis of: like physiographic characteristics; similar visual patterns, texture, color, variety, etc.; and areas which have similar impacts from man-made modifications...*
>
> *...Visual resource classes are categories assigned to public lands, which serves two purposes: (1) an inventory tool that portrays the relative value of the visual resources, and (2) a management tool that portrays the visual management objectives. There are four classes (I, II, III, and IV). ... Visual resource inventory classes are assigned through the inventory process. Class I is assigned to those areas where a management decision has been made previously to maintain a natural landscape. This includes areas such as national wilderness areas, the wild section of national wild and scenic rivers, and other congressionally and administratively designated areas where decisions have been made to preserve a natural landscape. Classes II, III, and IV are assigned based on a combination of scenic quality, sensitivity level, and distance zones. ... Inventory classes are informational in nature and provide the basis for considering visual values in the RMP process. They do not establish management direction and should not be used as a basis for constraining or limiting surface disturbing activities.*

The presence of a transmission line in VRM Classes I and II areas usually does not conform to visual management objectives. Areas where this occurs are identified as AOIs.

Best Management Practices for tower design and location were applied to reduce plan inconsistency as much as possible. This report describes each of the AOIs and explains why the VRM Class I and Class II area would be crossed and what consideration was given to avoiding the area. The type of amendment required, should routing in a co-preferred alternative or other alternative be selected, is then discussed. The analysis is provided in this appendix to meet the documentation requirements of the RMP. Maps showing the distribution of VRM classes within RMP and MFP boundaries are shown in Section 5.

2 PROJECT FEATURES AFFECTING VISUAL ENVIRONMENT

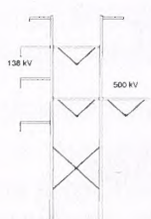
2.1 Facility Components

The Project facility components that affect the visual environment include:

- Two transmission line segments, their associated access roads, multipurpose and helicopter fly yards, and other temporary construction ground disturbances;
- Proposed substation and expansions or modifications at two existing substations and at one substation approved under the 2013 Record of Decision, and removal of one small existing substation;
- Relocation of portions of an existing 138-kV line;
- Other associated facilities including communication systems and optical fiber regeneration stations; and
- Access roads and distribution supply lines where needed for proposed substations and optical fiber regeneration stations.

Details of construction and operation activities are described in the Plan of Development Supplement included as Appendix B to the Draft SEIS. The August 2014 Draft Mitigation and Enhancement Portfolio Proposal (MEP) submitted by Rocky Mountain Power and Idaho Power (the Proponents) is part of the Proposed Action and is included in Appendix C of the Draft SEIS. Environmental protection plans are included as appendices to the August 2013 Plan of Development. All of these plans are considered part of the Project description for the proposed Project. Table 2.1-1 describes aspects of the primary proposed structures that would affect the visual environment.

Table 2.1-1. Primary Transmission Structures – Visual Description

Project Facility	Description
Transmission Line Segments	
Transmission Line Features Common to All Proposed 500-kV Segments  Example single-circuit structure	• Conductors: Bundled with three subconductors per phase. Non-specular (dull) finish rather than a shiny finish. • Estimated subconductor diameter: 1.504 inches. • Bundle spacing: Distance between subconductors is 18 inches and 25 inches. • Non-reflective, non-refractive insulators. • Typical ground clearance: 35 feet. • Structure types: lattice steel single- and double-circuit structures. Dulled galvanized steel finish. • Structure heights: Single-circuit structure varies between 145 and 180 feet. Average height of 156 feet. • Approximate distance between structures: 1,200 to 1,300 feet. • Right-of-way (ROW) width: 250 feet.
Proposed Double-Circuit 138/500-kV Structure (Revised Proposed – Segment 9/8H)  Example double-circuit structure	• 500-kV Conductor: Bundled with three subconductors per phase. Non-specular (dull) finish rather than a shiny finish. • Estimated subconductor diameter: 1.51 inches. • 500-kV Bundle spacing: Distance between subconductors is 18 inches and 25 inches. • 138-kV Conductor: Single aluminum conductor steel reinforced Estimated subconductor diameter: 1.05 inches • Non-reflective, non-refractive insulators • Minimum ground clearance: - 138-kV: 24 feet - 500-kV: 35 feet • Structure types: double-circuit steel H-frame structures, dull galvanized or self-weathering steel. • Structure heights: varies between 125 and 200 feet. • Approximate distance between structures: 900 to 1,200 feet • ROW width: 250 feet

2.2 Project-wide Visual Mitigation Measures Proposed by the Proponents

The Proponents have incorporated three mitigation measures into the Project to reduce visual impacts:

1. Transmission towers would be constructed of dulled galvanized steel to minimize visual impacts.
2. Non-specular (dull appearance) transmission line conductors would be used.

3 STUDY ASSUMPTIONS

The Interdisciplinary Team (IDT) assumed that BLM land use plan amendments would be required for AOIs. The IDT also assumed that design elements and/or other mitigation measures that reduce impacts would not always reduce the visual contrast to a level that conformed to an area's VRM class.

For the purpose of this study, the following approaches were used:

- The location of a route across VRM Class III is consistent with the class objectives if consideration was given to route alignments that would avoid the area and feasible mitigation was applied. It was determined that the Revised Proposed Routes and the other routes considered in this Draft SEIS would comply with VRM Class III; however, additional existing condition influences resulted in one instance of changing the VRM to Class IV.
- Direction for considering visual resource values stated in RMPs and MFPs were taken into consideration. Where absent or general in nature, the management direction provided in BLM Handbook H-1601-1, *Land Use Planning,* was considered (BLM 2005).
- The AOI analysis area consisted of up to 15 miles from either side of the centerline of the Project routes.

4 PROJECT-WIDE ALTERNATIVES DEVELOPMENT

During transmission line siting, VRM Class I and Class II lands were avoided where possible. The routes were also sited to avoid historic trails (where possible) and monuments, wildlife refuges, state or federal parks or monuments, prominent peaks, and populated areas and a variety of natural resources including raptor nests, sage-grouse leks, and core areas. The objective was to have the least overall impact.

The following text lists the steps that were taken to develop the routing considered in the two Co-Preferred Alternatives (Alternatives 2 and 5) and other five Alternatives considered in the SEIS.

Constraint analyses have been used for the Project to assist in siting the transmission line routes and alternatives. In the initial phase, the Proponents attempted to locate the routes between required interconnection points (substations) using a comprehensive set of avoidance and opportunity criteria. Using this information, the Proponents initially identified, evaluated, and compared corridors for each of the 10 segments. A Proposed Route was selected and corridors for additional routes were also evaluated for each segment.

Two general approaches were used to identify and evaluate various routes and select the Proposed Route and other routes carried forward for detailed study for each segment.

1. In proposed and established utility corridors[1] such as the Section 368 Energy Act West-wide Energy (WWE) corridor (DOE and BLM 2008) or BLM-designated utility corridors, and/or where existing transmission lines exist, analyses were completed to characterize the resources present in the areas crossed by the corridors and to determine if use of such corridors would result in significant environmental effects. A combination of constraint mapping, stakeholder input, and field reconnaissance was used to confirm the use of existing or planned corridors. In several cases, new routes deviating from the existing or planned corridors were proposed because of adjacent environmental constraints such as sage-grouse leks, historic features, and raptor nests.
2. Where no existing or planned corridors existed, a "Greenfield" siting approach was followed.[2] In those cases, a geographic information system (GIS) computer analysis (Linear Routing Tool [LRT]) was used to identify initial corridors for further evaluation. Using data from numerous public sources, the LRT was used to develop alternate transmission line corridors by considering both routing constraints and opportunities. Constraints are defined as resources or conditions that may be negatively affected by transmission line routing. Opportunities are defined as resources or conditions that are favorable to facility construction or operation because of their characteristics.

Opportunities included, but were not limited to, WWE corridors, BLM-designated utility corridors, and existing transmission lines. Many constraints were considered. These included railroads, pipelines, highways, state and national parks, wildlife refuges, BLM areas of critical environmental concern (ACECs), wilderness study areas (WSAs), Department of Defense land, Bureau of Indian Affairs land and reservations, prime farmland, irrigated agriculture, confined animal feeding operations, dairies, airports, residences, cities and towns, oil and gas wells, surface and underground mining, erodible soils, geologic hazards, steep slopes, paleontological and historical resources, wetlands and floodplains. A wide variety of plant and animal concerns were also considered, including plant and animal species of concern, sage-grouse leks and core areas, raptor nests, crucial big game winter and parturition ranges, wild horse and burro management areas, and sensitive fisheries. Visual considerations included BLM VRM Class I, II, and III areas; scenic overlooks; scenic highways; federally designated scenic areas; and state and local scenic byways. Following selection of proposed and other routes via the LRT process, the routes were further refined by reviewing aerial photography and topographic

[1] In order to achieve the capacity rating needed to serve present and future loads within the Proponents' service area, the Western Electricity Coordinating Council requires a minimum separation from existing transmission lines that serve substantially the same load as that served by each of the new Gateway West transmission segments. As described in Chapter 1 of the environmental impact statement, that minimum separation depends on the purpose of the existing line, the load it now serves, and the remaining capacity of the rest of the grid to absorb the load if the several co-located lines fail at once. For the purposes of the initial siting study, the longest span was assumed to be 1,500 feet, thereby dictating the minimum distance between existing and proposed transmission lines serving the same load.

[2] "Greenfield route" is a route that would be located away from linear corridors, thereby creating a new land use.

maps or on the basis of important input received from stakeholders, field reconnaissance, and other sources.

The BLM evaluated the initial routes, made adjustments, and added additional routes to minimize impacts. Later cooperators and other stakeholders identified routes, often to accomplish a dominant objective based on a single resource such as agriculture or historic sites over other resources including VRM classes. Following the 2013 Record of Decision, the BLM convened a Resource Advisory Committee to consider additional options in Segments 8 and 9. After considerable review, the BLM came up with two Co-Preferred Alternatives that incorporate specific routing options for Segments 8 and 9, and 5 additional Alternatives incorporating combinations of routing for Segments 8 and 9. Refer to Chapter 2 of the Draft SEIS for a discussion of this process. Taking all of the various constraints and opportunities into consideration, crossing of VRM sensitive lands could not be avoided throughout the Project. Section 5 of this report describes each AOI and identified proposed land use plan amendments for the Project to conform to the applicable land use plan.

5 AREAS OF INCONSISTENCY

This section of the report summarizes the conditions for each AOI. It is organized by RMP or MFP from east to west by route segment and by individual AOI. Analyses of the routes not being addressed in the SEIS were presented in the Final Environmental Impact Statement (FEIS). The description for each AOI includes a summary of the applicable BLM land use plan and any visual considerations described in the plan. The route segments and alternatives are then described by location and the rationale provided for why routes could not avoid VRM Class I and II areas. The general discussion is followed by a summary of the existing landscape conditions within the study area.

Site maps are included that show VRM classes and a visual analysis conducted for an area within a 15-mile radius of the AOI. Viewshed analyses were run using 180-foot transmission structures. Actual tower heights will vary depending on topography and other design considerations. The range for tower height discussed in Chapter 2 of the SEIS is between 125 and 200 feet. The intent of the viewshed analyses is to provide an indication of areas that could potentially have a view of the Project in the AOIs.

The last section of each AOI discussion is a consistency analysis describing the results of the analysis, and the degree to which the AOI conforms or differs from the VRM class objective. Included in some AOIs are photographic simulations of the Project, showing how the Project would appear within the landscape. A detailed description of the method for these simulations is provided in Section 3.2 of the FEIS. The analysis also describes proposed plan amendments for the AOIs that do not conform to existing land use plans.

The routes associated with the Co-Preferred Alternatives and with other Alternatives for the Project would require BLM actions to account for visual impacts in the planning areas under five different BLM land use plans. Affected land use plans include the Twin Falls MFP, 1987 Jarbidge RMP, Morley Nelson Snake River Birds of Prey National Conservation Area (SRBOP) RMP, Bennett Hills/Timmerman Hills MFP, and Bruneau

MFP. The Project would be in conformance with the 2015 Jarbidge RMP; therefore, some of the amendments for routes analyzed in the 2013 FEIS would no longer apply. Segments 8 and 9 contain a total of seven AOIs.

Table 5-1 lists AOIs by RMP/MFP and VRM class. Figure 5-1 is an overview map showing AOIs Project-wide.

Table 5-1. BLM RMP and MFP Areas of Inconsistency

Land Use Plan	AOI Designation	Area Name	Route Designation (Maximum Transmission Structure Height)	VRM Class Crossed
Twin Falls MFP	TF-1	Salmon Falls Creek	Revised Proposed 9 (180 feet) Route 9K FEIS Proposed 9	I and II
1987 Jarbidge RMP	J-5	North Oregon Trail	Revised Proposed 8 (180 feet)	I
SRBOP RMP/ 1987 Jarbidge RMP	BOP-1/J-3	South Oregon Trail	Revised Proposed 9/8H (180 feet)	II
SRBOP RMP	BOP-2	Sinker Butte	Revised Proposed 9/8H (180 feet)	II
	BOP-3	Guffey Butte	Revised Proposed 9/8H (180 feet)	II
Bennett Hills/ Timmerman Hills MFP	BH-1	Burnt Ridge	Proposed 8 (180 feet)	II
Bruneau MFP	B-1	Castle Creek	Routes 8G, 9K, FEIS Proposed 9	II

AOI – Area of Inconsistency; MFP – Management Framework Plan; RMP – Resource Management Plan; SRBOP – Morley Nelson Snake River Birds of Prey National Conservation Area; VRM – Visual Resource Management

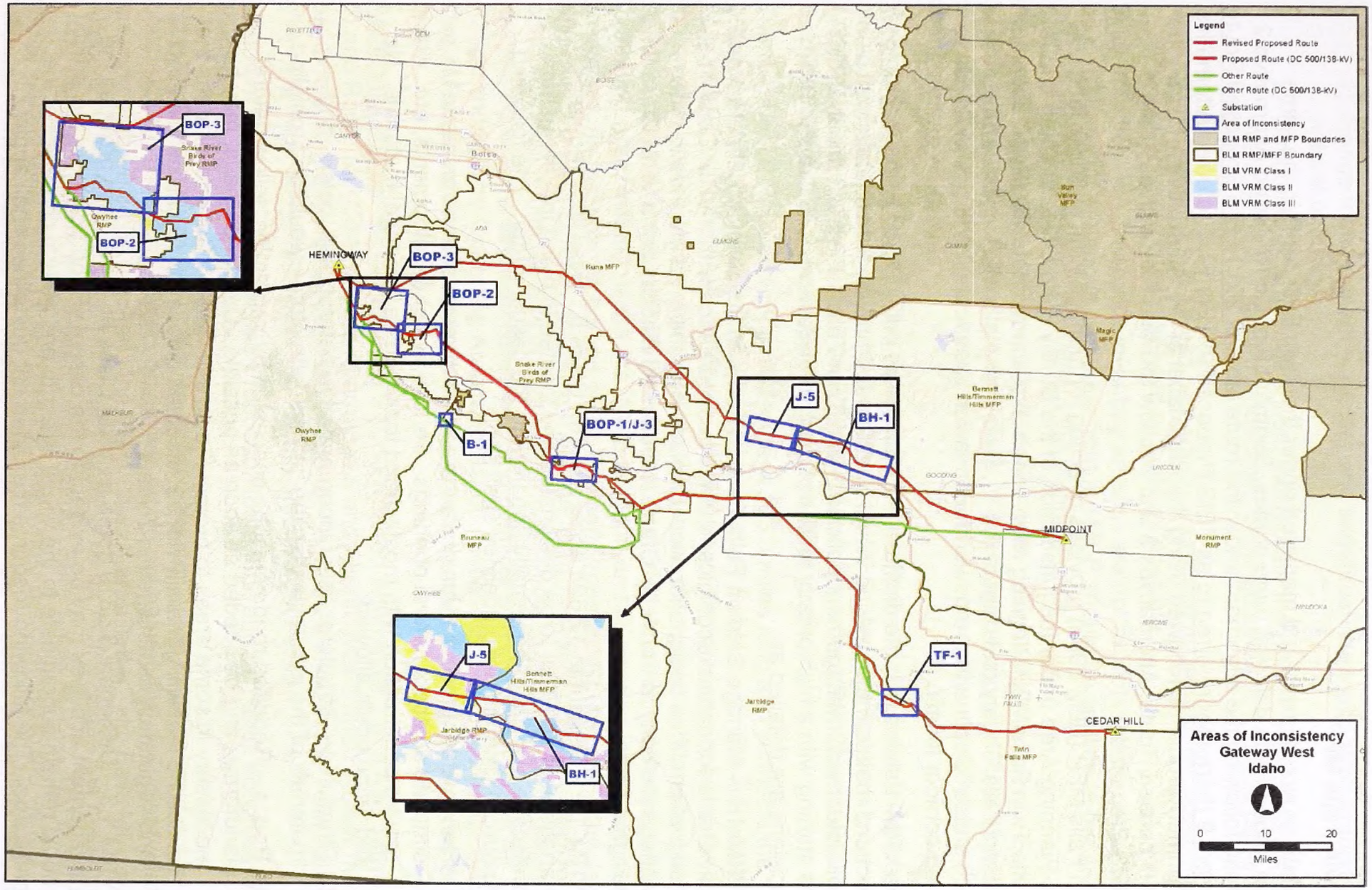


Figure 5-1. AOI Overview Map

5.1 Twin Falls MFP

All Alternatives would cross land managed under the Twin Falls MFP in the same alignment, though with different route names. Segment 9 of Co-Preferred Alternative 2 would cross following the alignment under the route label of 2013 FEIS Proposed Route for Segment 9 (hereafter referred to as FEIS Proposed 9). For Co-Preferred Alternative 5, the alignment would be followed using the route label of 9K. Alternative 1 follows the Revised Proposed Route, Alternatives 3 and 7 follow 9K, and Alternatives 4 and 6 follow FEIS Proposed 9.

The Twin Falls MFP (BLM 1982) provides direction for management of public land within its Planning Area under the jurisdiction of the Burley Field Office in south-central Idaho. The Twin Falls MFP Planning Area consists of approximately 809,000 acres in eastern Twin Falls County (see Figure 5.1-1). The Twin Falls MFP includes Objective L-4, which states "Confine future power transmission lines and oil and gas pipelines to designated corridor locations.

Objective VRM-1 states that the district is to "Manage all public lands in manner which will protect and maintain the existing visual qualities and provide for enhancement where consistent with management policies." The Twin Falls MFP lists various VRM decisions starting with a high priority for the protection of Salmon Falls Creek. The VRM decisions are detailed as:

- "VRM-1.1 – Manage Salmon Falls Canyon between the Salmon Falls Dam and Lilly Grade for natural ecological change in accordance with a VRM Class I designation. This designation would include only the area from rim to rim. Manage the canyon from Lilly Grade to Balanced Rock under a VRM Class II designation."
- "VRM-1.2 – Designate 12,695 acres as VRM Class II. This Class requires management activities to be designated and located to blend into the natural landscape and not to be visually apparent to the casual visitor. The following resource management guidelines shall apply:
    1) Range Management – Juniper and sagebrush removal must be made to simulate adjacent natural openings. Fences, water developments, etc., would require construction with mostly hand tools and be of natural materials. No red fence posts allowed.
    2) Structures – Structures must incorporate the natural lines, colors, and materials of the natural landscape, skylined structures would be prohibited.
    3) Roads – Required roads must be concealed by vegetation, follow natural landforms, and be seeded as soon as possible. Overland "roads" may be necessary in some areas to protect the scenic values. Cut and fill areas that exceed 5 feet will generally not be accepted unless the fill can be replaced and vegetation established in 2 years."
- "VRM 1.3 – Designate 32,819 acres as VRM Class III. This class provides the management activities may be evident to the casual visitor; however, the activity should remain subordinate to the visual strength and natural character of the landscape. The following resource management guidelines shall apply:

1) Range management – Juniper and sagebrush clearings shall simulate typical natural openings.
2) Structures – Structures should incorporate the natural lines, colors and materials of the natural landscape. Skylined structures should be avoided, if possible.
3) Roads – Roads should be partially concealed by vegetation, follow natural landforms, and be seeded as soon as possible."

Data from the visual resource inventory process are not available at this time, but it can be assumed that the above language from the MFP should be applied to the various VRM objectives assigned throughout the planning area.

An amendment to the MFP was approved in 1989, designating the Salmon Falls Creek ACEC to protect natural and scenic values. The Revised Proposed Route for Segment 9 would cross this area and therefore would not be in conformance with the management objectives.

Revised Proposed Route: The Revised Proposed Route for Segment 9 (Alternative 1) would cross land managed under the Twin Falls MFP. An amendment is proposed for AOI T-1. It would amend the Twin Falls MFP to change the VRM Class II area in the Salmon Falls ACEC crossed by the Project to VRM Class III.

The Segment 9 Revised Proposed Route is 165.3 miles long and connects the proposed Cedar Hill Substation with the Hemingway Substation. The line would be constructed as a single-circuit 500-kilovolt (kV) line. The primary concerns for siting in the eastern portion of this segment were avoidance of irrigated farmland and dairy operations; scattered residential development; interference with the Jarbidge Military Operating Area; making use of the WWE corridor; and minimizing impacts to visual resources. In the western portion of the Revised Proposed Route (within the Jarbidge and Owyhee Field Offices), following the WWE corridor was a primary objective. Other concerns included minimizing impact to Bruneau Dunes State Park and scenic qualities associated with the Bruneau River, avoiding conflicts with the Saylor Creek Air Force Range and Military Operating Area, and issues associated with crossing the SRBOP. Use of Public Land versus private land was an important issue for all portions of the route.

Additional Routes: FEIS Proposed 9 (Co-Preferred Alternative 2 and Alternatives 4 and 6) and Route 9K (Co-Preferred Alternative 5 and Alternatives 3 and 7) follow the same alignment as the Revised Proposed Route for Segment 9 through the Twin Falls MFP Planning Area and would require the same amendment action.

Segment 8 (Segment 8 Revised Proposed Route, 8G, and 8H) does not cross land managed under the Twin Falls MFP.

No Action Alternative: Under the No Action Alternative, the Project would not be constructed. Therefore, Project objectives would not be met, but no Project-related plan amendments would be required.One VRM Class II area in the Twin Falls MFP would be affected by the Project. AOI TF-1 was identified as an AOI because it is managed as VRM Class II. This AOI is located within Salmon Falls Creek ACEC. The presence of the proposed transmission line in this location would not conform to the visual management objectives. This section of Salmon Falls Creek is an eligible Wild and

Scenic River (WSR) segment; however, the Jarbidge Field Office has determined that this portion of the eligible river is Recreation eligible and that the transmission line crossing would not be in violation of managing for WSR eligibility.

5.1.1 AOI TF-1 Salmon Falls Creek (Segment 9 – Revised Proposed Route / Route 9K / FEIS Proposed 9)

The Salmon Falls Creek AOI is located approximately 4 miles south of Castleford, Idaho, in Twin Falls County. The AOI overlapped both the Twin Falls MFP and Jarbidge RMP boundaries before approval of the 2015 Jarbidge RMP, which designated the west side of the canyon in this area as VRM Class III. This means that the AOI now only applies to the Twin Falls MFP-managed areas, to the east side of Salmon Falls Creek. The Revised Proposed Route for Segment 9, FEIS Proposed 9, and Route 9K all follow the same alignment in this area, which proceeds west and north from the proposed Cedar Hill Substation, avoiding areas of irrigated agriculture. After crossing State Route (SR) 93, the route proceeds west to eastern border of Salmon Falls Creek ACEC, then turns northwest to parallel the east side of Salmon Falls Creek adjacent to an existing 138-kV transmission line for about 4.4 miles before turning west again and crossing the Salmon Falls Creek ACEC north of Lilly Grade, just north of the Salmon Falls Creek WSA, and VRM Class I designated area, but still part of the Salmon Falls Creek ACEC and eligible WSR segment. WSR eligibility requires management that prevents activities that could result in the river being declared WSR-unsuitable. The Revised Proposed Route for Segment 9/FEIS Proposed 9/9K would cross a Recreation portion of the river, adjacent to an existing single-phase low-voltage distribution line, just north of the Lilly Grade Road.

The AOI is managed as Class II and is crossed for 0.14 mile. Figure 5.1-2 shows the viewshed of the Salmon Falls Creek AOI; Revised Proposed Route, FEIS Proposed 9, 9K; and VRM management classifications. Figure 5.1-3 shows the AOI, routes, and amendment management recommendation.

5.1.1.1 Routes Considered

Several routes were analyzed in the 2013 FEIS that avoided the sensitive resources affected by the Revised Proposed Route/FEIS Proposed 9/9K. One of these routes (9B) would cross VRM Class II land near the Snake River as well as impacting residential and agricultural lands, and another route (9C) would cross Salmon Falls Creek in the vicinity of Balanced Rock County Park. The alignment for the Revised Proposed Route/FEIS Proposed 9/9K, which is the same as the FEIS Preferred Route in the Salmon Falls area, was selected by the Proponents based on its preferred location by Twin Falls County due to concerns over residential and agricultural impacts from the 2013 FEIS Route 9B.

While no amendments would be needed for the No Action Alternative, not constructing the route would not meet the Project objectives.

5.1.1.2 Existing Landscape Conditions

The 15-mile-radius study area for the Salmon Falls Creek AOI is located in southern Idaho. Approximately 75 percent of the study area is in Twin Falls County, and the remaining land is in Owyhee County. The topography is mostly flat to rolling with much

steeper slopes along the banks of Salmon Falls Creek and other drainages. Salmon Falls Creek traverses the study area in a canyon from the southeast, north to its confluence with the Snake River just north of the area at about mile 58.6. There are numerous farms and farmland in the northeastern part of this area with scattered farmland in other locations. The majority of the area is undeveloped. The small communities of Buhl and Filer are located along U.S. Highway (US) 30, in the northeast quadrant.

Attachment A, Figure TF-1a shows existing landscape conditions as viewed from Key Observation Point (KOP) 1068. The land adjacent to the proposed alignment is very flat and grass covered. In such an area, there is no topography or vegetation to screen views of the proposed line, which means skylining would occur. The steep topography along Salmon Falls Creek is not seen in the view from KOP 1068; however, it is discussed for KOP 1067 in the SEIS. KOP 1067 would not have a direct view of the Segment 9 Revised Proposed Route but it is representative of the existing landscape in the area and the views travelers would have both before and after seeing the Project.

Attachment A, Figure TF-1c shows the existing landscape conditions as viewed from KOP 1065. This represents the views of recreational users crossing the canyon at Lilly Grade. The Salmon Falls Creek Canyon is an aesthetic landscape element in the foreground and middle ground and represents a focus point at this location. Open panoramic views of the rolling (plains) to rugged (canyon) terrain are considered to have moderate scenic quality due to the muted sagebrush grassland vegetation adjacent to the rocky faces of the canyon. The view is representative of the Dissected High Lava Plateau eco-region which has alluvial fans, rolling plains, and sheer-walled canyons that are cut into extrusive rocks. This parcel of land administered by the BLM is managed to conform to VRM Class II objectives.

Attachment B, Figure B-1 shows views of the existing conditions as viewed from KOP 1067.

5.1.1.3 Conformance Analysis

Figure 5.1-2 shows the viewshed, KOPs, and other features within the 15-mile-radius study area. Attachment A, TF-1b simulates landscape conditions showing for the Revised Proposed Route as viewed from KOP 1068, and Figure TF-1d simulates conditions as viewed from KOP 1065.

Sensitive views of the sagebrush steppe and rolling grasslands west of Twin Falls adjacent to Salmon Falls Creek are important to the surrounding sensitive viewers such as recreational drivers, represented by views from KOPs 1068 and 1067, as well as the numerous residences on the east side of the creek. The flat to rolling landscape views from KOP 1068 exhibit little diversity in form, line, color, or texture. There is very little development visible this far from Twin Falls, Idaho. From this broad open vantage point it is apparent that screening and other mitigation efforts would not be successful in lowering impacts to scenic resources in the surrounding area. The flat plain and strong horizon line would be directly contrasted with the proposed transmission structures for the proposed transmission line would be visible and dominant. Views in the Salmon Falls Creek Canyon are also an important scenic resource and located in an interesting and diverse canyon landscape. The VRM Class II and scenic outstandingly remarkable values (ORV) objectives in the MFP have been assigned from canyon rim to canyon rim

to protect the viewshed of Salmon Falls Creek Canyon. Views from KOP 1065 represent the views of recreational users at the crossing of Lilly Grade Road and Salmon Falls Creek looking southeast toward rolling, undulating terrain of the Antelope Pocket. The view is representative of the Dissected High Lava Plateau eco-region, which has alluvial fans, rolling plains, and sheer-walled canyons that are cut into extrusive rocks. Open panoramic views of the rolling (plains) to rugged (canyon) terrain are considered to have moderate scenic quality due to the muted sagebrush grassland vegetation adjacent to the rocky faces of the canyon. The canyon for Salmon Falls Creek is an aesthetic landscape element in the foreground and middleground views, and is a focus point for the view. Through micrositing, it is likely that towers could be set back from the canyon rim such that the visual intrusion within the canyon would be confined to the conductors. The view from KOP 1067 would be typical of travels within the canyon and demonstrates the potential for micrositing to minimize visual impacts. Nevertheless, any intrusion would not conform to VRM Class II objectives. In addition, it would not conform to the management of the area according to the 1989 Salmon Falls ACEC amendment to the Twin Falls MFP, which prohibits powerline crossings and other such visual intrusions (see Appendix F of the SEIS).

5.1.1.4 Proposed Plan Amendment

There is a high degree of visual sensitivity in the crossing of Salmon Falls Creek due to its VRM Class II management objective, ACEC designation, and eligible WSR status. An amendment to the ACEC objectives and an amendment to the MFP VRM objectives would be needed to build this route.

The 1989 amendment establishing the Salmon Falls Creek ACEC directed the management of the Twin Falls MFP side to be consistent with the direction in the existing Jarbidge RMP. The 1987 Jarbidge RMP was more recent and had established protection measures for the area; therefore, the amendment directed management to be consistent on both sides of the creek. The 2015 Jarbidge RMP established a corridor (the Roseworth Corridor) where the Project would cross the canyon. Management within this corridor allows for overhead transmission lines and designates the majority of the ACEC area within the corridor as VRM Class III.

It is recommended that if the Segment 9 Revised Proposed Route (Alternative 1), FEIS Proposed 9 (Alternatives 2, 4, and 6), or Route 9K (Alternatives 3, 5, and 7) is selected, the Project be allowed to cross the ACEC and change the VRM classification to VRM Class III within this AOI area. This would provide similar management guidance to that provided on the Jarbidge side of the canyon and provide consistency with adjacent management goals.

If this route is selected, it is recommended that the Proponents be required to microsite structures to minimize the visibility from within the Salmon Falls Creek canyon. As discussed in Appendix F, this amendment, in addition to the amendment allowing the overhead crossing of the canyon by Gateway West, would affect how the BLM is able to manage the land according to the amendment to the MFP establishing the Salmon Falls Creek ACEC. The ACEC direction specifically states that no overhead crossing would be permitted. The Jarbidge BLM Field Office has stated that the crossing would not affect WSR eligibility because this section is only eligible for recreation, and they have

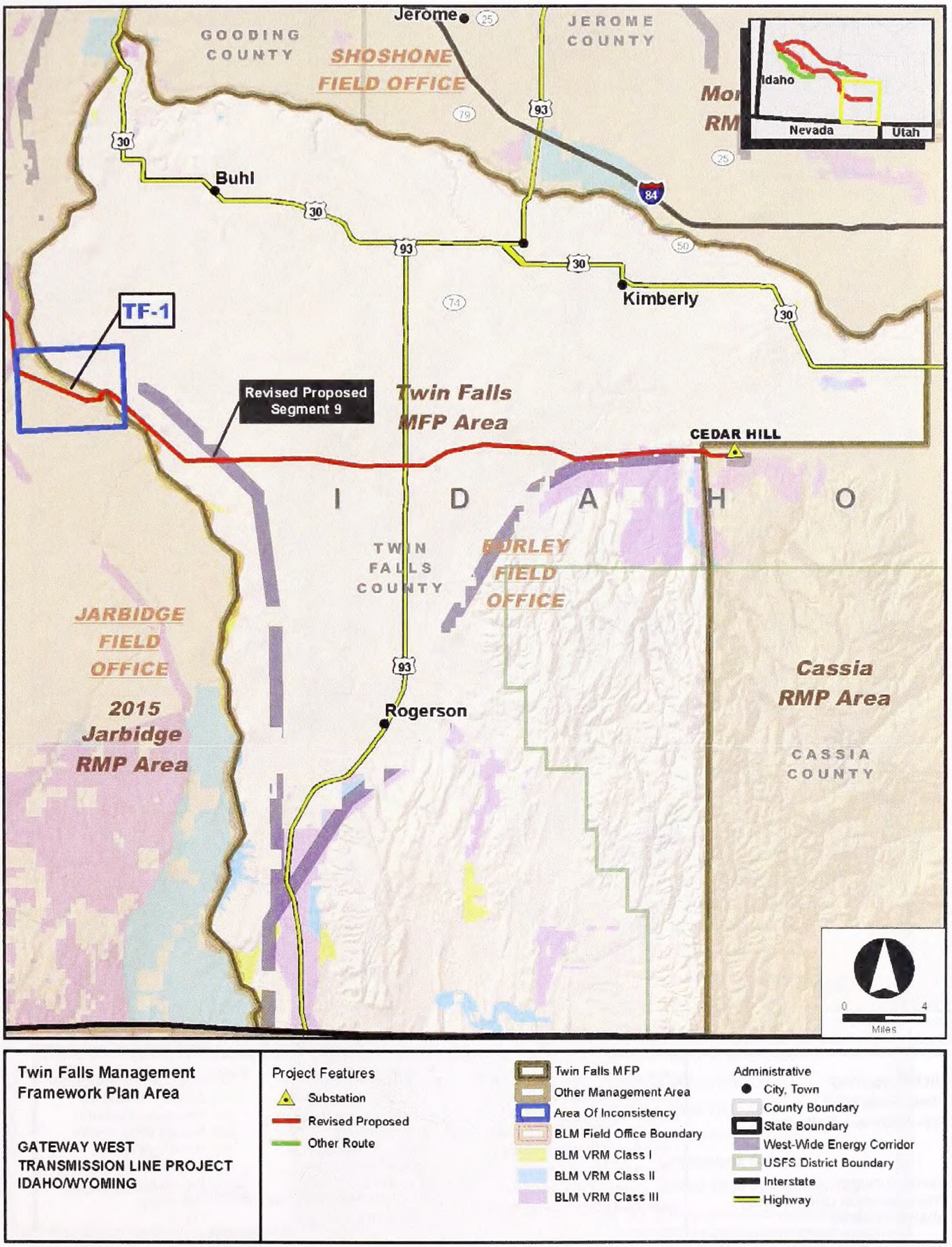


Figure 5.1-1. Twin Falls MFP Boundary Map

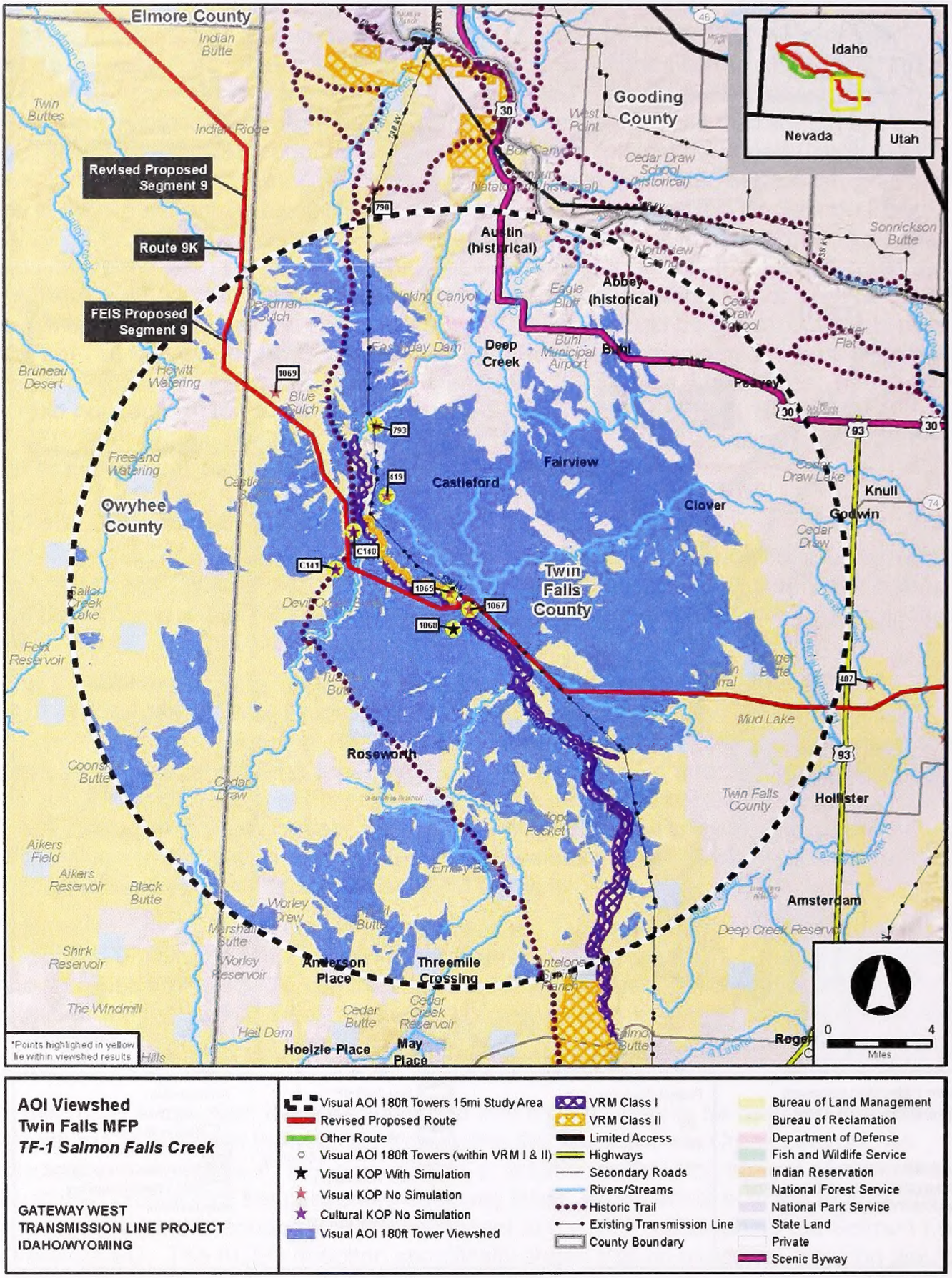


Figure 5.1-2. AOI TF-1 Salmon Falls Creek Visual Analysis for the Segment 9 Revised Proposed Route/FEIS Proposed 9/9K (Amendment SEIS-2)

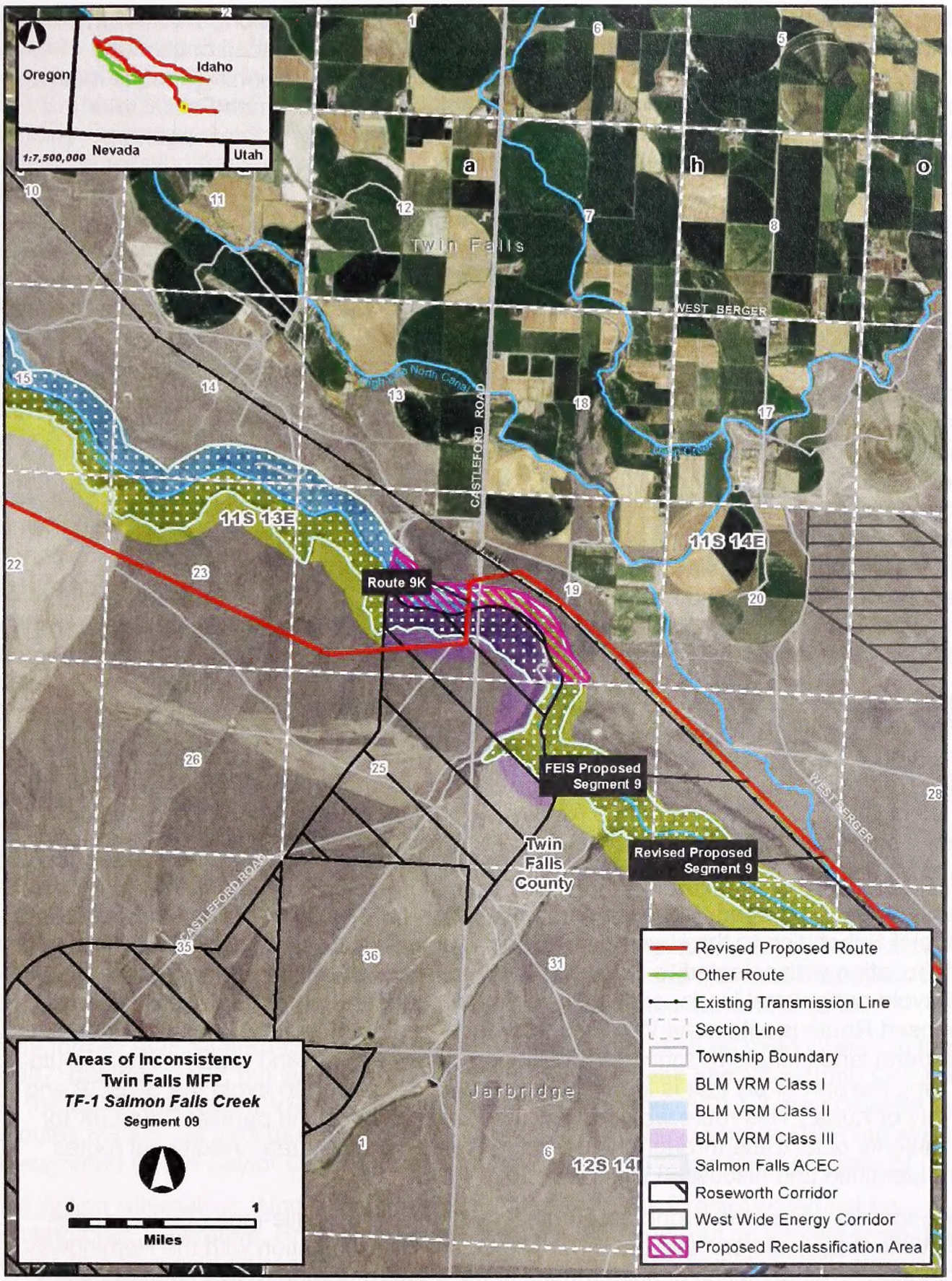


Figure 5.1-3. AOI TF-1 Salmon Falls Creek Detailed Map Showing the Proposed VRM Action for Amendment SEIS-2 within the Twin Falls MFP Planning Area

stated that such a crossing would not impair the ORVs. The crossing would result in a high visual impact at the canyon rims, but visibility would be reduced once in the canyon. While the area of the AOI within the Twin Falls MFP Planning Area is relatively small, it is part of the protective management actions for the Salmon Falls Creek canyon. Changing this VRM Class would result in a lower level of management protection for this resource.

5.2 1987 Jarbidge RMP

In August 2015, the BLM approved a new RMP for the Jarbidge Field Office area. This new RMP modified VRM designations within the current Jarbidge Field Office boundaries. The proposed Project and Alternatives would be in conformance with these new VRM designations within the area covered by the 2015 RMP. The boundaries for this RMP coincide with the current boundaries of the Jarbidge Field Office, which is smaller than the area covered by the 1987 RMP; therefore, there are still a few areas crossed by the Project that are managed under the 1987 RMP where the land is not included in any more recent land use plans. This includes the area north of the Snake River (which is crossed by the Revised Proposed Route for Segment 8) and the arm of land extending to the west of the Field Office that joins with the SRBOP (which is crossed by the Revised Proposed Route for Segment 9). The 1987 Jarbidge RMP includes a map of VRM classified lands (Map 9). In addition, the RMP provides locations of utility lines and utility avoidance areas (Map 7). Segments 8 and 9 of the Revised Proposed Route as well as Route 8H would cross areas managed under the 1987 RMP that would not conform to VRM designations.

Revised Proposed Routes: The Segment 8 Revised Proposed Route (Co-Preferred Alternative 2, Alternatives 1 and 3) would cross a VRM Class I area near the Oregon Trail in an area still managed under the 1987 Jarbidge RMP within the Four Rivers Field Office (AOI J-5). An amendment would be needed to change the area from VRM Class I to VRM Class IV. The Segment 9 Revised Proposed Route (Alternative 1) would cross a small parcel of VRM Class II just west of the SRBOP (AOI J-3). An amendment would be needed to change the area from VRM Class II to VRM Class III.

The Segment 8 Revised Proposed Route would be 129.7 miles long and connect the Midpoint Substation to the Hemingway Substation with a single-circuit 500-kV line. The route location was selected to follow the WWE corridor or existing transmission lines and avoid agricultural lands, especially in the southeastern portions. The Revised Proposed Route is within the WWE corridor for a portion of its total length. Constraints on federal land include historic trails, wetlands, steep slopes, and raptor nests. Route 8G (and the part of 8H that is identical to 8G) was developed to avoid the SRBOP and the city of Kuna. This route would follow the WWE corridor and parallel Route 9K for the majority of its route through the Jarbidge RMP Planning Area. Additional routes were identified and discussed within the 2013 FEIS.

The Segment 9 Revised Proposed Route would be a 165.3-mile-long 500-kV single-circuit line that would connect the proposed Cedar Hill Substation with the Hemingway Substation. Primary siting considerations in the eastern portion of this segment were avoidance of irrigated farmland, dairy operations, and scattered residential development; avoiding interference with the Jarbidge Military Operating Area; making

use of the WWE corridor; and minimizing impacts to visual resources. In the western portion, following the WWE corridor was a primary objective, with other concerns such as minimizing impact to Bruneau Dunes State Park and scenic qualities associated with the Bruneau River, and avoiding conflicts with the Saylor Creek Air Force Range and Military Operating Area. This route was developed to utilize public land and would follow an existing transmission line through the SRBOP. In addition, certain areas through the SRBOP would be double-circuited (see route description in Chapter 2 of the SEIS). Route 9K would follow the same alignment as the Segment 9 Revised Proposed Route through much of the Jarbidge RMP Planning Area; however, at the western edge, it diverges and travels south, following a modified version of the alignment for FEIS Route 9E. This route avoids most of the SRBOP.

Additional amendments were proposed in the 2013 FEIS; however, the Project would now be in conformance with the VRM in these areas (AOIs J-1, J-2, and J-4) under the 2015 RMP. The Jarbidge RMP (BLM 1987) and 1989 amendment provided VRM guidance, management for the Salmon Falls Creek ACEC, which precluded new overhead utility lines. The 2015 RMP establishes the Roseworth Corridor for utility use and designates the VRM in the ACEC within the corridor as VRM Class III; therefore, an amendment is no longer required. The Saylor Creek AOI (J-2) was designated VRM Class II in the 1987 RMP, but is within the Saylor Creek Corridor and VRM Class IV in the 2015 RMP, so an amendment is no longer needed.

Other Routes: Route 9K (Co-Preferred Alternative 5, Alternatives 3 and 7) follows the same route as the Segment 9 Revised Proposed Route through most of its alignment through the Jarbidge Field Office, turning south before Segment 9 of the Revised Proposed Route heads northwest towards the SRBOP, and AOI J-3. This route would not cross any AOIs in the Jarbidge Field Office under the 2015 RMP, and does not cross any areas managed under the 1987 Jarbidge RMP. FEIS Proposed 9 (Co-Preferred Alternative 2, Alternatives 4 and 6) follows the same alignment as Route 9K through the Jarbidge Field Office. Route 8G crosses into the Jarbidge Field Office near the northeast corner of the management area and heads west until it meets up with Route 9K, at which point it would parallel that route through the remainder of the Field Office. Route 8G (Co-Preferred Alternative 5 and Alterative 4) conforms to the VRM in the 2015 RMP and does not cross land managed under the 1987 RMP. Route 8H (Alternatives 6 and 7) would follow the same alignment as the Revised Proposed Route for Segment 9, east of the Jarbidge Field Office, crossing the same AOI (J-3).

The former AOI J-4 area crossed by Route 8G was designated as VRM Class I in the 1987 Jarbidge RMP, but was designated as the Saylor Creek and Shoestring Corridors in the 2015 RMP with a VRM of Class III and IV. The former AOI J-2 area crossed by Routes 8G and 9K was designated VRM Class II in the 1987 Jarbidge RMP but was designated as the Saylor Creek Corridor in the 2015 RMP with a VRM of Class IV.

No Action Alternative: Under the No Action Alternative, the Project would not be constructed. Therefore, Project objectives would not be met, but no Project-related plan amendments would be required. While approval of the 2015 Jarbidge RMP means that the Project is now in conformance with the VRM requirements within the Jarbidge Field Office, there are two areas where the Revised Proposed Routes (and Route 8H, following the same alignment as the Revised Proposed Route for Segment 9) cross

land that is now in the Four Rivers FO and still managed under the 1987 Jarbidge RMP and where the routes would not conform to the 1987 RMP VRM objectives. As a result, BLM action would be necessary to modify the visual classifications and management to conform to the RMP. The AOIs are described in Sections 5.2.2 and 5.2.3, below.

5.2.1 Former AOIs Where the Project Now Conforms to the VRM Objectives, due to Reclassification in the 2015 Jarbidge RMP

Three AOIs in the 2013 FEIS are no longer considered AOIs for the SEIS analysis due to the approval of the 2015 Jarbidge RMP. The new RMP has new VRM designations that the Project would conform to. A brief summary for each of these former AOIs is provided below. As stated above, however, this RMP only applies to the current Jarbidge Field Office boundaries; therefore, the Project still does not conform to the VRM classification where the AOIs were located outside of the current Jarbidge Field Office boundaries, and where no more recent management plans have been adopted.

5.2.1.1 2013 FEIS AOI J-1/TF-1 Salmon Falls Creek (Segment 9 Revised Proposed Route/FEIS Proposed 9/9K)

The Salmon Falls Creek crossing is located approximately 4 miles south of Castleford, Idaho, in Twin Falls County. This area overlaps both the Twin Falls MFP and Jarbidge RMP boundaries. Segment 9 of the Revised Proposed Route, FEIS Proposed 9, and Route 9K follow the same alignment across Salmon Falls Creek. The 1987 Jarbidge RMP and 1989 ACEC amendment designated the area as VRM Class II and prohibited new overhead utility lines, respectively, which the Project would not be in conformance with. The 2015 Jarbidge RMP, however, designated this location as part of the Roseworth Corridor and classified the area as VRM Class III. This designation allows for the utility line crossing, if done according to RMP requirements; therefore, an amendment is no longer required and an AOI analysis is not needed. This area is not discussed further in this section.

5.2.1.2 2013 FEIS AOI J-2 Saylor Creek (Segment 9 Revised Proposed Route/ FEIS Proposed 9/9K, 8G, 8H)

The Saylor Creek area crossing is located about 4 miles south of the Snake River, approximately 18 miles south of Mountain Home, Owyhee County, Idaho, and is less than 1 mile west of the Elmore County/Owyhee County boundary. As the routes proceed west, constrained on the south by the Saylor Creek Range Air Force restricted area and on the north by Bruneau Dunes State Park, they cross approximately 2 miles of land classified as VRM Class II in the 1987 Jarbidge RMP. This area is located in a low interval of hills within the WWE corridor. Segment 9 of the Revised Proposed Route, FEIS Proposed 9, and Routes 8G, 8H, and 9K would all cross this area. If an alternative including Route 8G or 8H is selected (Co-Preferred Alternative 2, or Alternatives 1, 3, 6, or 7), two lines would run parallel through this area. The 2015 Jarbidge RMP classifies this area as VRM Class IV and designates a corridor where the route alignment is located. The Project would now conform to the VRM objectives of the managing RMP and is no longer inconsistent with management in the area. This area is therefore not discussed further in this section.

5.2.1.3 2013 FEIS AOI J-4 Oregon Trail (Segment 8 – Route 8G/8H)

This area is located approximately 13 miles east and slightly north of Hagerman, Idaho. Routes 8G and 8H share the same alignment, which passes through the area of the former Oregon Trail AOI. Route 8G/8H follows a route similar to portions of the 2013 FEIS Routes 8A and 9B, which passed less than 1 mile from each other. Both alignments were identified as potential routes because they follow the WWE corridor for much of their lengths. Route 8G/8H would follow existing transmission lines through this area and crosses the Oregon Trail AOI in a westerly fashion, crossing just south of the southern portion of the AOI crossed by FEIS Route 8A and at an almost identical location as FEIS Route 9B. The 1987 Jarbidge FEIS designated land crossed by the route in this area as VRM Class I; however, the 2015 Jarbidge RMP designates this area as a utility corridor and VRM Class IV. The route would conform to these updated designations and an amendment would not be needed. Therefore, this area is not further discussed in this section.

5.2.2 AOI BOP-1/J-3 South Oregon Trail (Segment 9 Revised Proposed Route/8H)

The South Oregon Trail AOI is located north and south of the Snake River, beginning at the C.J. Strike Reservoir dam. This AOI overlaps both the SRBOP and Jarbidge RMP boundaries. This route follows a modified version of FEIS Route 9D/9G and FEIS Route 9F/9H, leaving the alignment for FEIS Proposed 9 and Route 9K near Bruneau, Idaho, heading northwest for about 6 miles before intercepting the C.J. Strike Reservoir, formed at the junction of the Bruneau River and the Snake River. Land surrounding the reservoir has been designated as VRM Class II due to its scenic qualities and close proximity to the Oregon National Historic Trail (NHT). The route initially enters the SRBOP briefly then re-enters the SRBOP, double-circuiting with the existing C.J. Strike – Bruneau Bridge 138-kV transmission line in the current right-of-way (ROW) at milepost (MP) 106.2 for approximately 3.1 miles (the existing 138-kV structures would be removed). At MP 109.4, the two circuits separate to permit a more feasible crossing of the Narrows between C.J. Strike Reservoir and the Bruneau Arm. On the west side of the Bruneau River, the two lines again become a double circuit at MP 110 across the Cove non-motorized and recreation areas, and continue west approximately 2 miles to the C.J. Strike Dam, where the lines again separate at MP 112 and the existing 138-kV line enters a substation at the dam. The Segment 9 Revised Proposed Route continues west on the south side of the reservoir crossing back to the north side of the Snake River approximately one-half mile downstream from C.J. Strike Dam. Although not located within a WWE corridor, this route follows existing transmission lines through much of its alignment.

The portion of the AOI within the Jarbidge RMP crosses 0.3 mile of BLM-administered land managed for VRM Class II objectives. The land crossed is along the northern plateau to the north of the Snake River.

Figure 5.2-2 shows the viewshed of the South Oregon Trail AOI, the Segment 9 Revised Proposed Route/8H, and VRM management classifications. Figure 5.2-3 shows the AOI, routes, and amendment management recommendation.

5.2.2.1 Routes Considered

Three routes in the western portion of Segment 9 were analyzed in the FEIS as a means of connecting the Cedar Hill and Hemingway Substations. The FEIS Proposed 9 is largely within the WWE corridor but crosses more private land than the other routes. The Segment 9 Revised Proposed Route is a modification of FEIS Routes 9D, 9F, 9G, and 9H through the SRBOP, which are part of an alignment identified by the Owyhee County task force and recommended by Owyhee County to avoid private land and maximize the use of public land. The revisions from the FEIS routes include adjusting where the route crosses south of the Snake River. The Segment 9 Revised Proposed Route would cross at the western edge of the narrows of the Bruneau Arm. This is a modification from the FEIS route, which crossed at the eastern end of the narrows and then followed the southern edge of the Cove non-motorized area. The revision crosses a small section of the Cove non-motorized area in the northwest corner. No VRM Class I or Class II areas managed by the 1987 Jarbidge RMP are crossed by FEIS Proposed 9, Route 9K, or FEIS Route 9E.

While no amendments would be needed for the No Action Alternative, not constructing the route would not meet the Project objectives.

5.2.2.2 Existing Landscape Conditions

The Snake River is the major water feature in the 15-mile-radius area surrounding the South Oregon Trail AOI. The river crosses the middle of the area from west to east and leaves the study area in the vicinity of Indian Cove. C.J. Strike Reservoir is located at the northern end of the Bruneau Valley in the center of the area. The topography is generally flat to rolling with numerous drainages. Although much of the area is undeveloped, there are large areas of farms and farmland along the Snake River, south of Mountain Home, and in other locations such as the Bruneau Valley and Twentymile Flat. SR 78 is the major road and generally follows the Snake River east to west. SR 51 extends north to south though the area. There are a number of communities along the local highways and Snake River including Grandview and Bruneau. Mountain Home Air Force Base is located in the northeast portion of the study area. Numerous transmission lines cross this area. In addition to the highways and communities, other potential viewing areas include recreation areas such as Bruneau Dunes State Park, the SRBOP, and historic sites and trails. KOP 1155 shows views of the Snake River from Oregon NHT visitor's center. KOP 1154 shows views of existing transmission lines at the C.J. Strike Reservoir.

The Jarbidge portion of this AOI consists of a small parcel of VRM Class II land just east of the SRBOP. KOP 1156 is located southwest of this area and is more relevant to the BOP-1 AOI but describes some of the typical area of interest in the general vicinity. The Jarbidge portion of the AOI area consists of flat topography above the Bruneau Arm of the C.J. Strike Reservoir (see Figure 5.2-3), and approximately 0.2 mile north of the South Alternate Oregon Trail. KOP C117 is approximately one mile northwest of this location, on a segment of the Oregon NHT – South Alternate, where it consists of an undisturbed set of swales. A transmission line with wooden, H-frame support structures is visible approximately 100 feet west of the trail at this location, and an additional transmission line with wooden, single-pole supports is visible approximately 150 feet

west of the trail. The landscape consists of flat land to rolling hills with grass and sagebrush dominating the vegetation.

Attachment B, Figure B-2 shows the view of the existing conditions from KOP C117. Figure B-3 shows an alternate view of the existing conditions from KOP 1156. Figure B-4 shows the view of the existing conditions from KOP 1155.

5.2.2.3 Conformance Analysis

Figure 5.2-2 shows the viewshed, KOPs, and other features within the 15-mile-radius study area. Due to topography, only portions of the Segment 9 Revised Proposed Route would be visible from this location. The Project is located to the south of KOP C117, away from existing impacts to the cultural landscape. Due to the proximity of the KOP and the introduction of new elements in a new area of the resource's viewshed, the visual contrast rating (VCR) for this KOP is assessed as moderate to strong. The proposed Project elements would dominate the setting to the south; therefore, there would be an adverse impact to the resource at this location.

Scenic views of the C.J. Strike Reservoir and the surrounding Snake River Plain are available to sensitive recreational viewers at nearby locations including KOPs 1154 and 1156, and visitors to the Oregon NHT (KOP 1155). The views of the undulating to rocky terrain from these viewpoints exhibit diversity in form, line, and texture with numerous human-made features such as high voltage transmission lines and a dam. From these KOPs, it is apparent that the Segment 9 Revised Proposed Route/Route 8H would be visible in the foreground and middle ground, sometimes skylined and at other times backdropped. In this location, the existing wood pole H-frame structures would be replaced with double-circuit 500/138-kV structures. Screening and other mitigation efforts would be moderately successful at lowering impacts to scenic resources in the surrounding area. The undulating and rugged terrain with mottled and diverse vegetation and expansive waters of the reservoir would be moderately contrasted by an additional set of structures. These additions would draw the attention of the casual observer in certain portions of the area; represent a deviation from the natural form, line, color, and texture of the surrounding landscape; and thus would not conform to VRM Class II objectives. The Boise District office has stated that the alignment to the east and north of the river within the VRM Class II area would be buffered by topography and thus would not attract the attention of the casual observer. It appears that VRM Class II objectives have been assigned to this particular area to protect the Oregon NHT corridor and adjacent landscapes.

5.2.2.4 Plan Amendment for Segment 9 Revised Proposed Route

A high-voltage transmission line would not conform to the VRM Class II management goals for those VRM Class II areas west of the Snake River. It is recommended that, if the Segment 9 Revised Proposed Route (Alternative 1) or Route 8H (Alternatives 6 and 7) is selected, VRM Class II areas associated with the route be reclassified to VRM Class III for the Jarbidge RMP portion of AOI BOP-1/J-3 (see Figure 5.2-3).

5.2.3 AOI J-5 North Oregon Trail (Segment 8 Revised Proposed Route)

The North Oregon Trail AOI is located about 4 miles north of Glenns Ferry, Idaho. From Midpoint Substation, the Segment 8 Revised Proposed Route proceeds to the west-northwest following existing transmission lines. As the route approaches King Hill Creek, approximately 3.2 miles of VRM Class I land is crossed, just south of Blair Trail Reservoir. Visually sensitive features in this area include views of Bennett Mountain to the north, Kings Crown to the east, and several Oregon NHT segments. Figure 5.2-4 shows the viewshed of the North Oregon Trail AOI, the location of the Revised Proposed Route and other routes, historic trails and VRM management classifications. Figure 5.2-5 shows the AOI and amendment management recommendations.

5.2.3.1 Other Routes Considered

Route 8G/8H would avoid this area and would cross the Jarbidge Field Office south of the Snake River within the Shoestring and Saylor Creek Corridors. It would parallel Route 9K through much of the Jarbidge Field Office and continue to do so through the Owyhee and Bruneau Field Offices, where it would cross one isolated parcel of VRM Class II land. No VRM amendments to the 1987 or 2015 Jarbidge RMPs would be needed for Route 8G/8H, although a VRM amendment would be needed for the Bruneau MFP.

There are no routes in the vicinity of the Revised Proposed Route that would completely avoid VRM Class I and II land, due to the presence of scenic local features, historic trails, and the Snake River Canyon. Several Segment 8 routes were reviewed for the 2013 FEIS in locations north of the Proposed Route; however, these routes had even greater impacts to sensitive visual resources, steep terrain, and Special Recreation Management Areas (SRMA) and ACECs. The FEIS Route 8A is the nearest feasible alternate route within the vicinity of the Segment 8 Revised Proposed Route. This route was described in the 2013 FEIS.

While no amendments would be needed for the No Action Alternative, not constructing the route would not meet the Project objectives.

5.2.3.2 Existing Landscape Conditions

The Snake River is the major water feature in the 15-mile-radius area surrounding the North Oregon Trail AOI. It crosses the southern half of the area from east to west and leaves the study area just east of the community of Mountain Home. The flat to rolling topography on both sides of the river is cut by numerous drainages, many with steep, canyon-like walls. The northern part of the area is occupied by steep terrain of the Bennett Hills. Although much of the area is undeveloped, there are large areas of farms and farmland along the Snake River and in other locations such as Indian Cove, Deadman Flat, Black Mesa, and Pasadena Valley. Interstate 84 crosses southeast and then east through the study area. Communities such as Hammett, Glenns Ferry, and King Hill are located along local highways and the Snake River. Numerous transmission lines cross northwest to southeast through this area. Potential viewing areas include highways, communities, historic sites and trails, and recreation areas such as Three Island Crossing State Park. Scenic views of Kings Crown along the foothills of Bennett Mountain are represented by KOPs C108, 1209, and 1210. KOPs 1209 and 1210 represent local residents whereas KOP C108 represents recreational viewers on the Oregon NHT.

Attachment A, Figure J-5a shows existing landscape conditions as viewed from KOP 1350. The land in close proximity to the alignment is very flat and grass-covered. In such an area, there is no topography or vegetation to screen views of the proposed line, which means skylining would occur.

Attachment A, Figure J-5c shows existing landscape conditions as viewed from KOP C83. This KOP is located on a segment of the North Alternate Oregon Trail near the site of the Canyon Creek Stage Station where the trail intersects King Hill Road. The KOP is approximately 1.1 miles west of King Hill Creek and 2.7 miles northwest of the Snake River. The KOP is 0.5 mile south of the Segment 8 Revised Proposed Route. The resource at this location consists of a moderately deep swale. The setting contains a wooden, H-frame transmission line less than 0.25 mile to the north and modern ranching properties are visible approximately 2 miles to the east.

Attachment B, Figures B-5, B-6, and B-7 show the existing conditions as viewed from KOPs C108, 1209, and 1210, respectively.

5.2.3.3 Conformance Analysis

Figure 5.2-4 shows the viewshed, KOPs, and other features within the 15-mile-radius study area. Attachment A, Figure J-5b simulates landscape conditions showing for the Revised Proposed Route as viewed from KOP 1350. Attachment A, Figure J-5d simulates landscape conditions showing for the Revised Proposed Route as viewed from KOP C83. The Project's design shares some similarities with existing structures in the area but would introduce new elements that are of different form, material, and texture. Due to these factors, the KOP's proximity to the route, and the potential for the elements to blend into the backdrop, the VCR for this KOP is assessed as weak to moderate. The Project elements may draw the attention of the casual observer; therefore, there would be an adverse impact to the resource at this location.

The views of the undulating terrain adjacent to KOPs C108, 1209, and 1210 exhibit some diversity in form, line, and texture and include numerous human-made features. KOP C108 has a view of a high-voltage transmission line. KOPs 1209 and 1210 have views of numerous high-voltage transmission lines and a wind farm. From these KOPs, the Revised Proposed Route for Segment 8 would be moderately visible due to the presence of existing transmission lines and structures. Screening and other mitigation efforts would not lower impacts to scenic resources in the surrounding area.

The additional set of transmission structures and access roads would be in contrast with the landscape topography, draw the attention of the casual observer, and represent a deviation from the natural form, line, color, and texture, which would not conform to VRM Class I objectives.

5.2.3.4 Plan Amendment for Revised Proposed Route

An amendment is proposed if the Segment 8 Revised Proposed Route (Alternatives 1, 2, and 3) is selected. The amendment would reclassify the area that would be impacted by the transmission line, now managed to conform to VRM Class II objectives, to be managed under VRM Class IV objectives (see Figure 5.2-5).

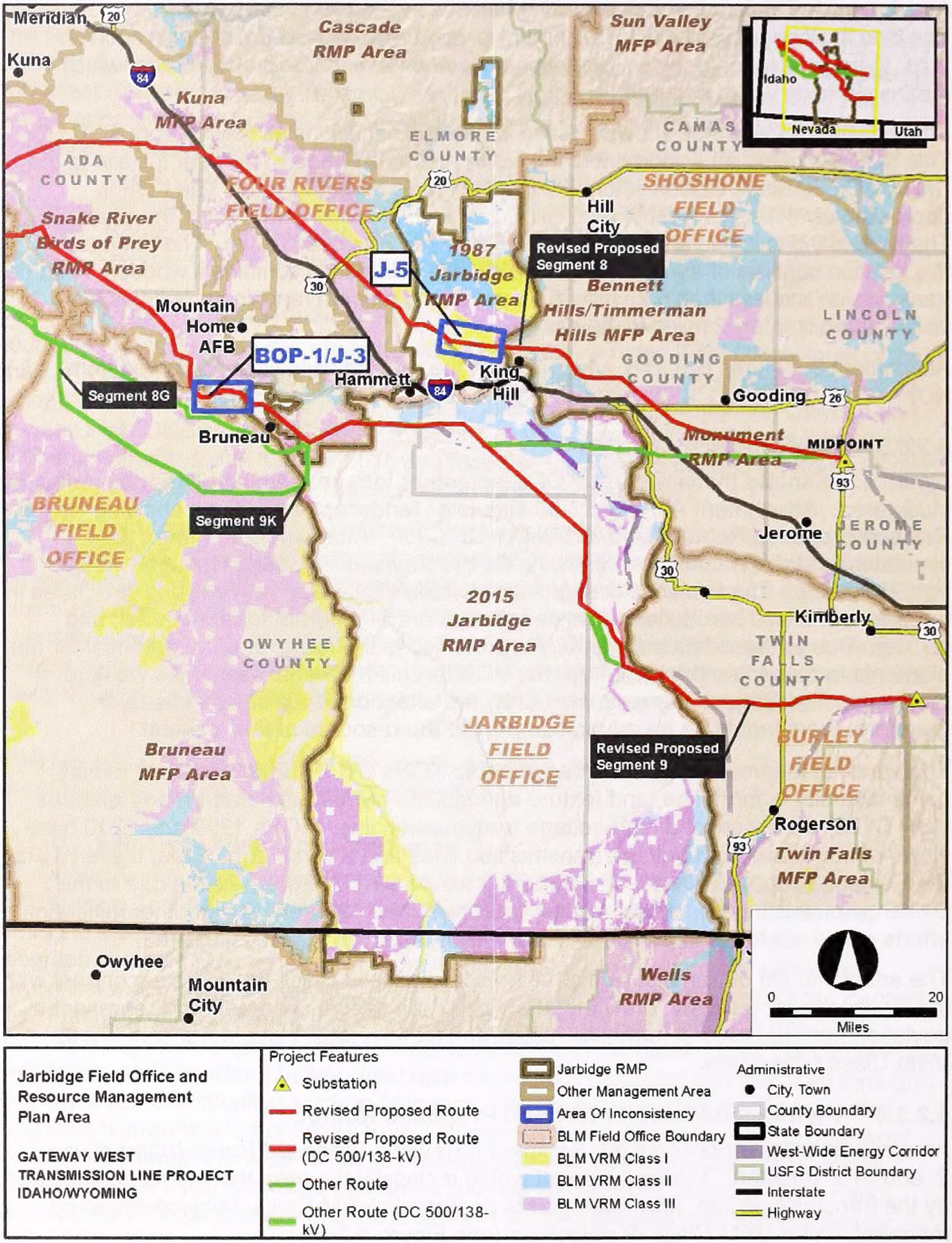


Figure 5.2-1. Jarbidge RMP Boundary Map

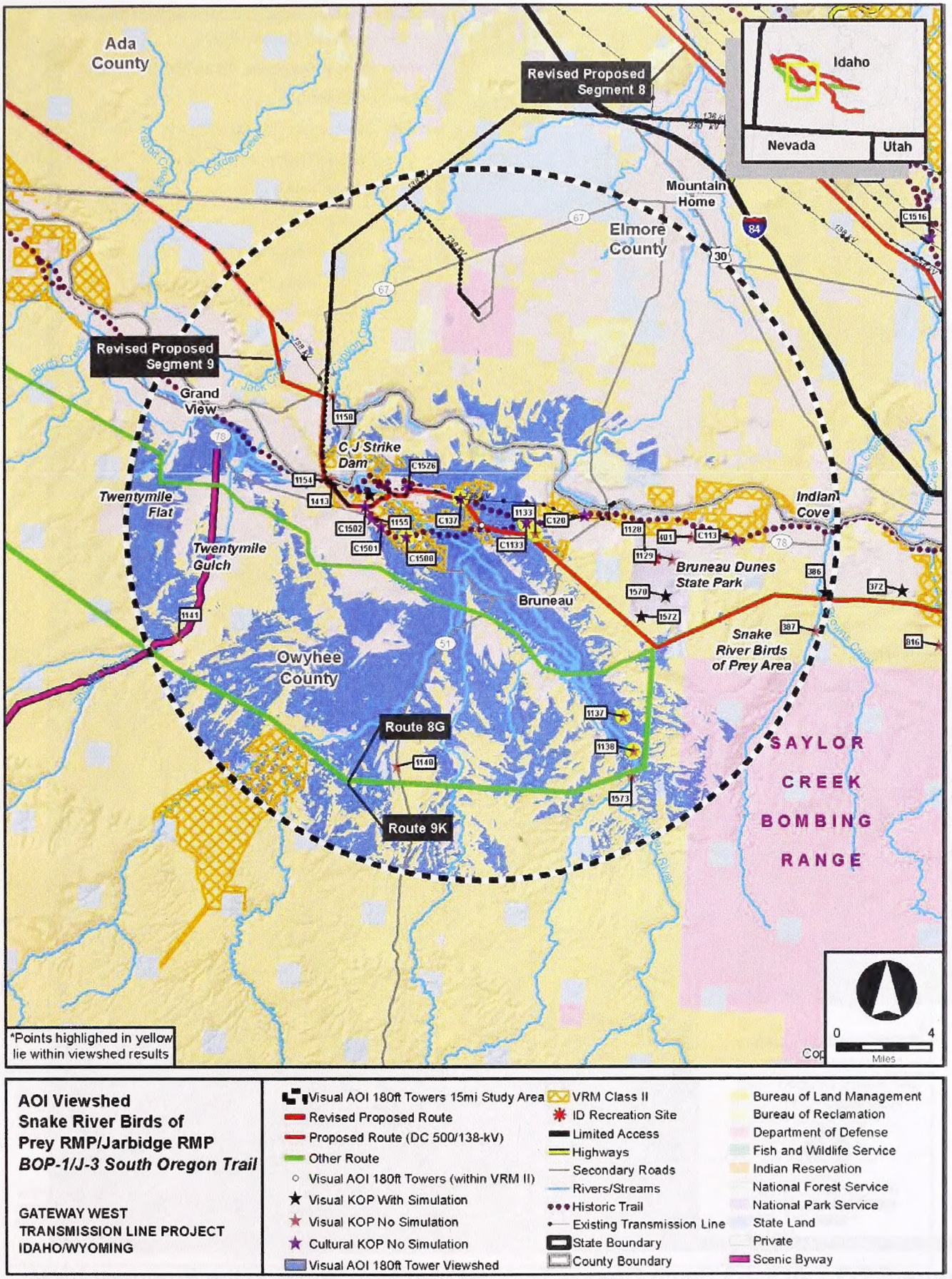


Figure 5.2-2. AOI J-3 South Oregon Trail Visual Analysis for the Segment 9 Revised Proposed Route/8H (Amendment SEIS-14)

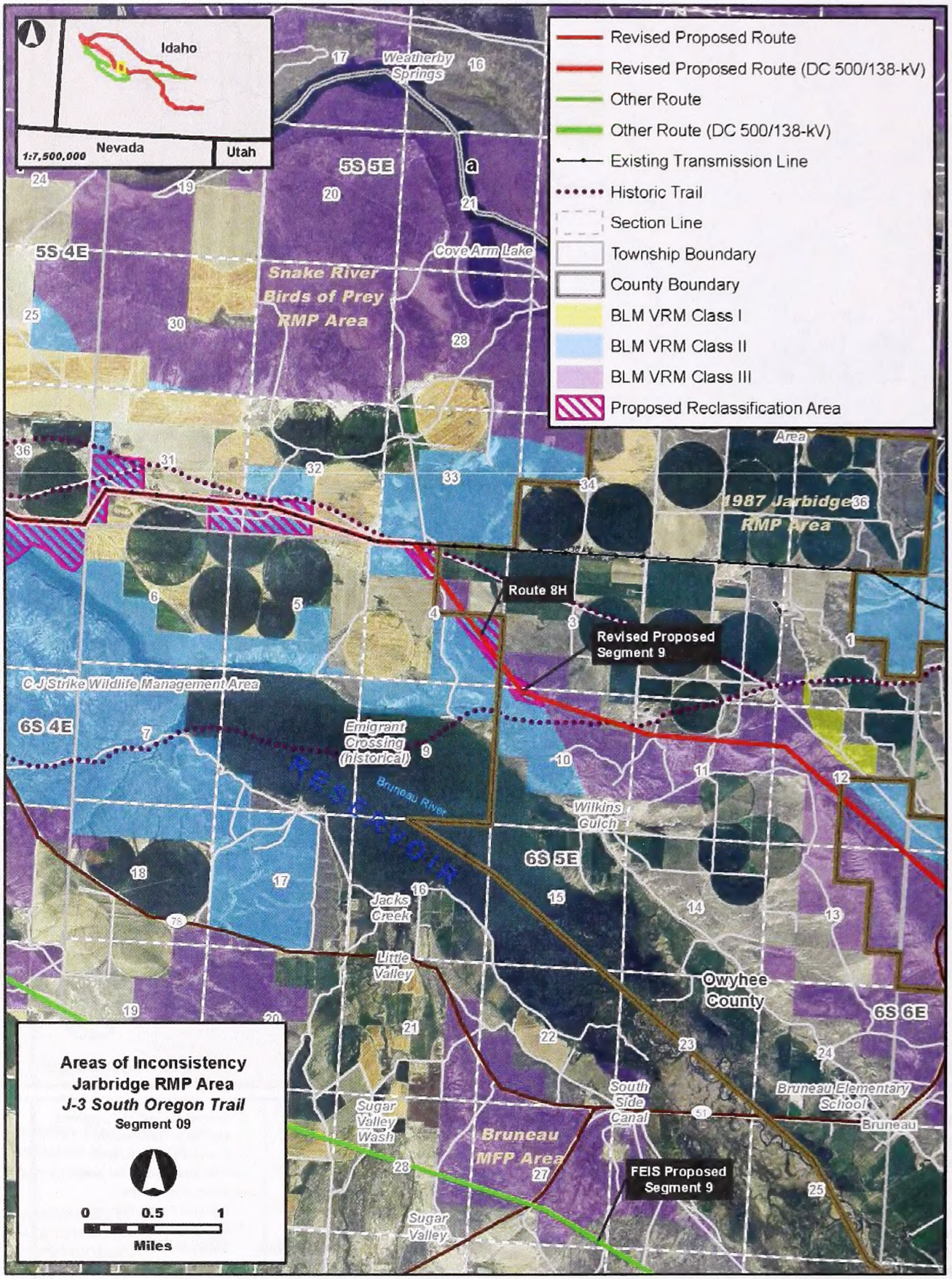


Figure 5.2-3. AOI J-3 South Oregon Trail Detailed Map Showing the Proposed VRM Action for Amendment SEIS-14 (located where Revised Proposed Segment 9 label is pointing) within the 1987 Jarbidge RMP Planning Area

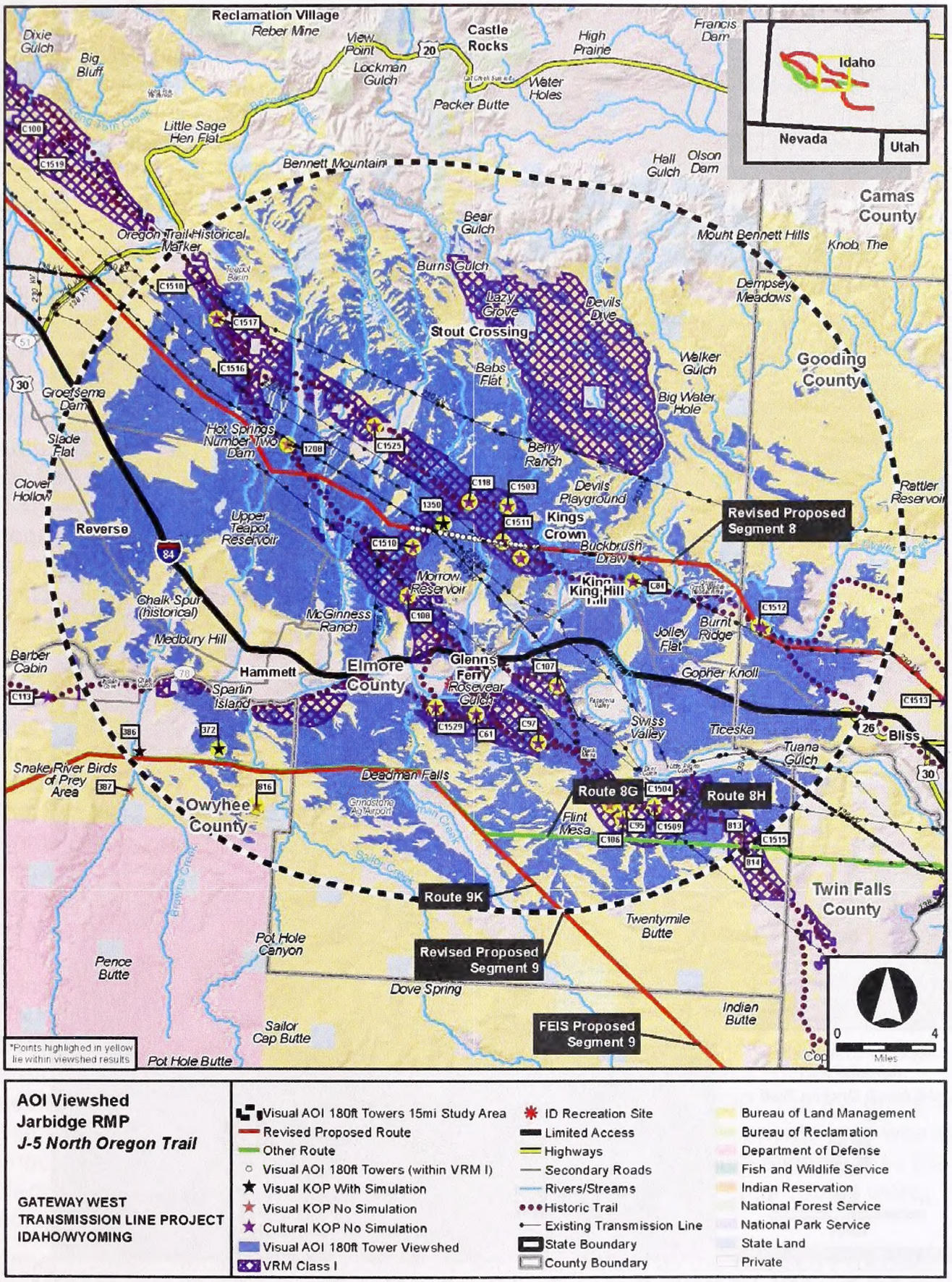


Figure 5.2-4. AOI J-5 North Oregon Trail Visual Analysis for the Segment 8 Revised Proposed Route

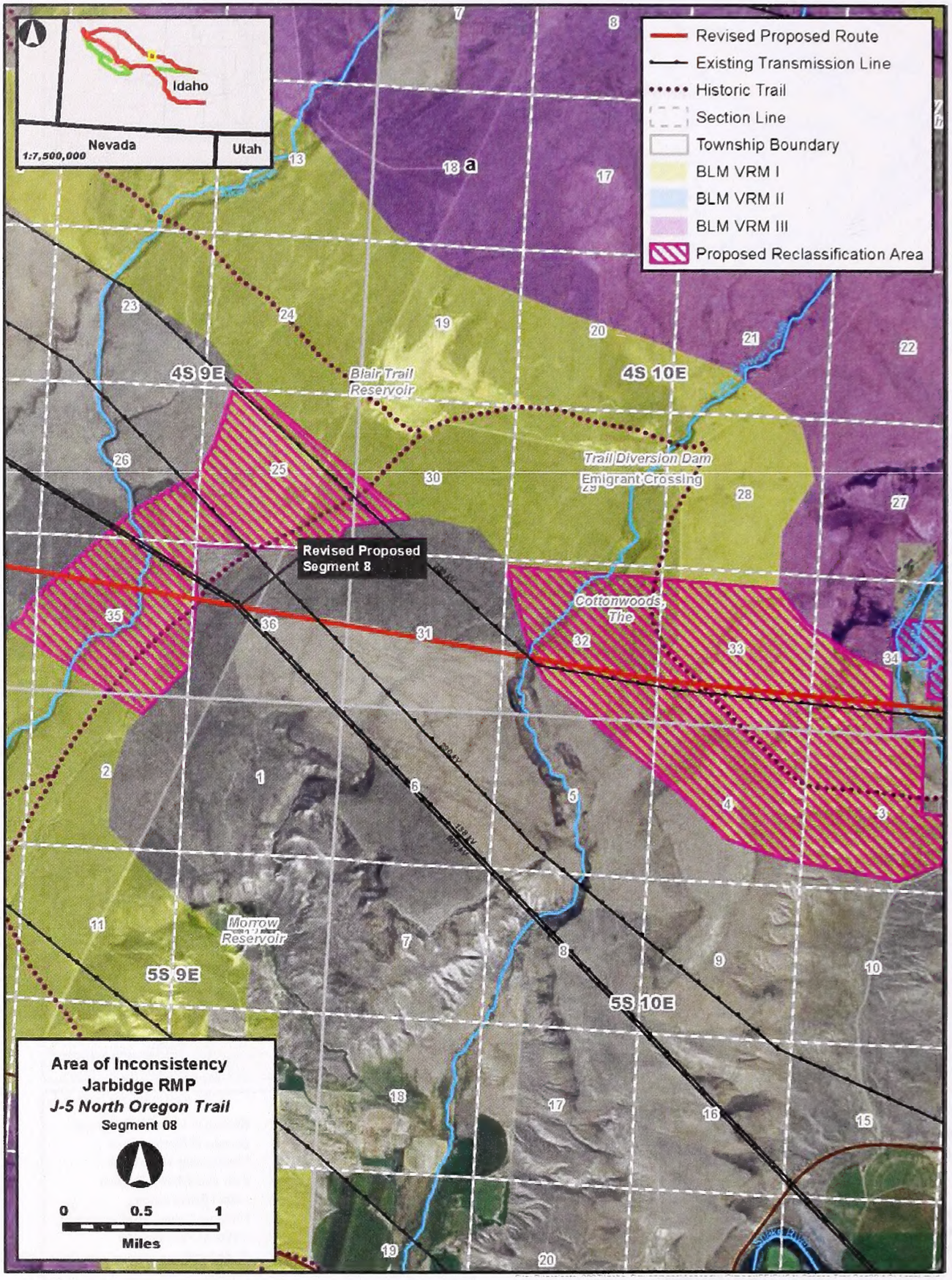


Figure 5.2-5. AOI J-5 North Oregon Trail Detailed Map Showing the Proposed VRM Action for Amendment SEIS-5 within the 1987 Jarbidge RMP Planning Area

5.3 SRBOP RMP

The SRBOP RMP (BLM 2008a) provides guidance for the public lands and resources within the SRBOP that are managed as a part of the BLM Four Rivers Field Office. The SRBOP contains approximately 483,700 acres of Public Land extending 81 miles along the Snake River in the Idaho counties of Ada, Canyon, Elmore, and Owyhee (see Figure 5.3-1). The SRBOP includes the 138,000-acre Orchard Combat Training Center,[3] used by the Idaho Army National Guard for military training since 1953. The RMP provides for protection of the Oregon NHT as a VRM Class II management area. The RMP further provides direction to "manage the areas along the Oregon Trail and the Snake River Canyon as VRM Class II, the Army National Guard Orchard Training Area (OTA) as VRM Class IV, and remaining areas as Class III. This RMP will provide reasonable protection of the Oregon Trail and flexibility in managing the remainder of the NCA."

Portions of all routes for all Alternatives would cross the SRBOP RMP management area; however, only the alignment for the Segment 9 Revised Proposed Route/Route 8H would cross AOIs in this area. The 2013 FEIS routes included analysis of Segment 8 and alternate routing to Segment 9 and assessed varying routing regarding constraints such as the Orchard Combat Training Center, the Halverson Bar non-motorized area, National Historic Districts, NHTs, the Snake River, and commercial and residential areas as well as additional recreation sites, such as Centennial Park. Following existing transmission lines and minimizing new road construction were key considerations in developing the Segment 9 Revised Proposed Route/Route8H for the SEIS.

Segment 9 Revised Proposed Route (Alternative 1): The Segment 9 Revised Proposed Route would cross three AOIs in the SRBOP concerning VRM Class II managed land. The Segment 9 Revised Proposed Route is a 165.3-mile-long 500-kV single-circuit line that would connect the proposed Cedar Hill Substation with the Hemingway Substation. Primary siting considerations in the eastern portion of this segment were avoidance of irrigated farmland, dairy operations, and scattered residential development; avoidance of interference with the Jarbidge Military Operating Area; making use of the WWE corridor; and minimizing impacts to visual resources. In the western portion of Segment 9, the area near to and within the SRBOP, following existing transmission lines was a primary objective. Other concerns included minimizing impact to Bruneau Dunes State Park and scenic qualities associated with the Bruneau River, avoiding conflicts with the Saylor Creek Air Force Range and Military Operating Area, the Cove non-motorized area, the Oregon Trail and SRMA, the C.J. Strike SRMA, the Snake River SRMA, additional historic sites, sage-grouse leks, and crossing the SRBOP. For the entire line segment, placement of the transmission line on public land versus private land was an important issue with local stakeholders. Route 8H follows the same alignment as the Segment 9 Revised Proposed Route through the SRBOP. Eight other routes were considered in the 2013 FEIS.

Other Routes: Route 8H would follow the same alignment as the Revised Proposed Route in this area and would therefore cross the same AOI (BOP-1). Routes 9K, FEIS

[3] Formerly named the Orchard Training Area.

Proposed 9, and 8G would not cross any AOIs in this RMP area. Neither Co-Preferred Alternative (Alternatives 2 and 5) would include the Segment 9 Revised Proposed Route or Route 8H; therefore, no amendments are proposed. The visual analyses for amendments that would be needed if one of these routes were selected (under Alternatives 1, 6, or 7) are presented below.

No Action Alternative: Under the No Action Alternative, the Project would not be constructed. Therefore, Project objectives would not be met, but no Project-related plan amendments would be required.

Three VRM Class II management areas are crossed by the Segment 9 Revised Proposed Route/8H: one near the C.J. Strike Reservoir, one near Sinker Butte, and another at the South Alternative Oregon Trail. The presence of a transmission line in these landscapes would not meet VRM Class II management objectives. To construct the proposed transmission line following the alignment for the Revised Proposed Route/8H, BLM action would be necessary to either modify visual classifications or allow the Project without changing the VRM class in order for the Project to be in conformance with the RMP. However, it was determined during the 2013 FEIS process that allowing the Project in the SRBOP would not meet the intent of the enabling statute of the SRBOP. The Proponents prepared an MEP, and additional recommendations were made by BLM resource managers in an effort to provide sufficient mitigation and enhancement opportunities to balance the effects of an additional transmission line. These included other habitat and resource improvements such that the Project could potentially be built without being in conflict with the enabling statute. These mitigation actions and additional measures are discussed in the SEIS.

The AOIs are described below in Sections 5.3.1 through 5.3.3.

5.3.1 AOI BOP-1/J-3 South Oregon Trail (Segment 9 Revised Proposed Route/Route 8H)

The South Oregon Trail AOI is located north and south of the Snake River, beginning at the C.J. Strike Reservoir dam. This AOI overlaps both the SRBOP and Jarbidge RMP boundaries. The Segment 9 Revised Proposed Route leaves the FEIS Proposed 9 near Bruneau, Idaho, heading northwest for about 6 miles before intercepting the C.J. Strike Reservoir, at the junction of the Bruneau River and the Snake River. Land surrounding the reservoir has been designated as VRM Class II due to its scenic qualities and close proximity to the Oregon NHT. The route turns west, paralleling the Oregon NHT, and crossing the western end of the Narrows portion of the Bruneau Arm of C.J. Strike Reservoir, again as a double-circuit design. The route then continues in a general westerly direction on the south side of the reservoir, crossing back to the north side of the Snake River approximately 0.5 mile downstream from the C.J. Strike Reservoir dam. Except for minor detours to avoid agricultural land, the route continues west from the dam then turns to the northwest, crossing the SRBOP before re-joining the Proposed Route east of Hemingway Substation. Although not located within a WWE corridor, this route generally follows existing transmission lines. The portion of the AOI within the SRBOP RMP crosses a 330-acre parcel for 0.4 mile, a 587-acre parcel for 0.6 mile, a 195-acre parcel for 0.7 mile, a 142-acre parcel for 0.4 mile, and the western portion of a 3,859-acre parcel for 3 miles of land managed for VRM Class II objectives. A small parcel of VRM Class II just north of this area would also be crossed

for 0.3 mile. Figure 5.3-2 shows the viewshed of the South Oregon Trail AOI, the Segment 9 Revised Proposed Route/Route 8H, and VRM management classifications. Figure 5.3-3 shows the AOI and amendment management recommendations.

5.3.1.1 Other Routes Considered

The 2013 FEIS analyzed the Proposed Route and eight alternative routes in the western portion of Segment 9 as a means of connecting the Cedar Hill and Hemingway Substations. The 2013 FEIS Proposed Route is largely within the WWE corridor but crosses more private land than some other routes. The 2013 FEIS Routes 9D, 9F, 9G, and 9H are variations on an alignment identified by the Owyhee County Task Force and recommended by Owyhee County as its preferred route to avoid private land and maximize the use of public land. This alignment and substantially deviates from the designated WWE corridor and would cross the SRBOP. Route adjustments were made to avoid sage-grouse leks and non-motorized areas as well as other resources such as reducing impacts to the Oregon NHT. Routes 9K, 8G, and FEIS Proposed 9 avoid this area, as does FEIS Route 9E.

While no amendments would be needed for the No Action Alternative, not constructing the route would not meet the Project objectives.

5.3.1.2 Existing Landscape Conditions

The Snake River is the major water feature in the 15-mile-radius area surrounding the South Oregon Trail AOI. The river crosses the middle of the area from west to east and leaves the study area in the vicinity of Indian Cove. C.J. Strike Reservoir is located at the northern end of the Bruneau Valley in the center of the area. The topography is generally flat to rolling with numerous drainages. Although much of the area is undeveloped, there are large areas of farms and farmland along the Snake River, south of Mountain Home, and the Bruneau Valley and Twentymile Flat. SR 78 is the major road and generally follows the Snake River east to west. SR 51 extends north to south though the area. Communities, such as Grandview and Bruneau, are located along local highways and the Snake River. Mountain Home Air Force Base is located in the northeast portion of the study area. Numerous transmission lines cross this area. Potential viewing areas include highways, communities, historic sites and trails, and recreation areas such as Bruneau Dunes State Park. In the eastern portion of the AOI, a double-circuit structure would replace the existing structures. The surrounding landscape here is flat with buttes in the background. The existing structures are highly visible in the landscape.

Appendix E, Figure E.2-10a shows the existing landscape from KOP 1155 (also referred to as KOP C1155). This view represents the view of recreational users of the BLM's Cove Recreation Site at the C.J. Strike Reservoir and of the Oregon NHT. The KOP is located at the intersection of Route 78 and a graded gravel/dirt road. The views of the relatively flat to undulating terrain with plateau silhouettes in the background exhibit diversity in form line and texture. Existing human-made features include roads, agricultural field, and a wood-pole H-frame in the middleground and background. The trail swales are also visible in the view to the left.

Appendix E, Figure E.2-11a shows existing landscape conditions as viewed from KOP 1156. The area consists of rolling terrain that slopes toward the reservoir. An existing wood pole H-frame transmission line is evident in the view. More distant views toward the north are characterized by water and bluffs.

Appendix E, Figure E.1-3a shows the existing landscape from KOP C137, located on a portion of the Oregon Trail. The resource at this location consists of a deep swale 15 to 17 feet wide, as well as a shallow swale approximately 10 feet wide running parallel, and is marked with Carsonite posts (see Appendix J of this SEIS). Multiple existing power lines are highly visible from this location.

5.3.1.3 Conformance Analysis

Figure 5.3-2 shows the viewshed, KOPs, and other features within the 15-mile-radius study area. Scenic views of the C.J. Strike Reservoir and the surrounding Snake River Plain are available to sensitive recreational viewers at nearby locations including KOPs 1154 and 1156 and visitors to the Oregon NHT (KOP 1155). The views of the undulating to rocky terrain from these viewpoints exhibit diversity in form, line, and texture. Developments, such as high-voltage transmission lines and a dam, are in view as well. From these KOPs, it is apparent that the Segment 9 Revised Proposed Route would be visible in the foreground and middleground, sometimes skylined and at other times backdropped. In this location, the existing wood pole H-frame line would be replaced with a double-circuit 138/500-kV line.

Appendix E, Figure E.2-10b simulates the view from KOP 1155. High-sensitivity recreational viewers at KOP 1155 would have a high level of Project visibility (less than 0.5 mile from the Revised Proposed Route). The viewer would have an expansive view toward the alignment, which would not parallel any existing alignments or linear features and has the potential to skyline the view due to background terrain being too small of a scale to adequately absorb structures. The Project's design shares some similarities with existing structures in the area but would introduce new elements that are of different form and color. Due to the existing structures in the south, the distance of KOP 1155 from the Revised Proposed Route, and the cumulative effect of adding new structures in an area with numerous vertical human-made elements, the contrast for this KOP is assessed as moderate. The Project's elements would draw the attention of the casual observer but would not dominate the setting. Potential visual impacts on recreational viewers and drivers from this KOP and in the general vicinity are expected to be moderate to high due to the Project creating a new highly visible linear feature of high contrast in a landscape with moderate to high scenic quality.

Appendix E, Figure E.2-11b simulates the landscape conditions, showing the Segment 9 Revised Proposed Route as viewed from KOP 1156. High-sensitivity recreational viewers at KOP 1156 would have a moderate level of Project visibility (approximately 0.4 mile from the Revised Proposed Route). The viewer would have a partially screened view toward the alignment, which would parallel an existing alignment. Contrast levels are anticipated to be low to moderate. Potential visual impacts on recreational viewers from this KOP and in the general vicinity are expected to be moderate due to existing disturbance, partial screening, and Class B scenic quality.

Screening and other mitigation efforts would be only moderately successful at lowering impacts to scenic resources in the surrounding area. The undulating and rugged terrain with mottled and diverse vegetation and the expansive waters of the reservoir would be moderately contrasted by an additional set of structures.

Appendix E, Figure 1-3b simulates the view from KOP C137. This view represents those of visitors to the Oregon NHT. The location is not in the more heavily used recreational locations but does represent a historic resource. The simulated view includes replacement of the existing H-pole structure with the double circuit structures. These would be larger than the existing structures and be highly visible from the KOP, with the nearest tower one-tenth of a mile away. These structures would be highly visible to the casual observer and create contrast with the existing landscape; however, due to existing cultural modifications, they would not reduce the overall Scenic Quality Rating for the cultural Analysis Unit (see Appendix J of the SEIS). These modifications, however, would not conform to the VRM Class II designation.

These additions would draw the attention of the casual observer and represent a deviation from the natural form, line, color, and texture of the surrounding landscape; and therefore would not conform to VRM Class II objectives. It would appear that VRM Class II objectives have been assigned to this particular area to protect the Oregon NHT corridor and adjacent landscapes.

5.3.1.4 Plan Amendment for Segment 9 Revised Proposed Route/Route 8H

The Revised Proposed Route for Segment 9 and Route 8H include a 500-kV transmission line, as well as moving a 138-kV line into a double-circuit configuration through part of the AOI. Neither of these configurations would be compatible with VRM Class II objectives; therefore, the VRM Class II areas associated with the Oregon NHT and Snake River Canyon scenic areas that would be crossed by the transmission line, where the line would not conform to VRM Class II objectives, would be reclassified to be managed with VRM Class III objectives (see Figure 5.3-3).

5.3.2 AOI BOP-2 Sinker Butte (Segment 9 Revised Proposed Route/Route 8H)

The Sinker Butte AOI is located about 20 miles south of Kuna, Idaho, on the western portion of the Segment 9 Revised Proposed Route (Alternative 1) and Route 8H (Alternatives 6 and 7). This route is a variation of the routes developed through the SRBOP for the 2013 FEIS. FEIS Routes 9D, 9F, 9G, and 9H were developed to address recommendations from Owyhee County Taskforce and Owyhee County and providing options to avoid the Cove non-motorized area and other cultural resource considerations. The primary County siting criteria were avoidance of private land and maximizing the use of public land. In the vicinity of Sinker Butte, the Segment 9 Revised Proposed Route crosses Swan Falls Reservoir about 2 miles south of Swan Falls Dam. In this section of the Sinker Butte AOI, the route crosses one 16,759-acre parcel for a distance of approximately 3.6 miles on land managed by the BLM for VRM Class II objectives to protect scenic views of the Snake River and the area around the Oregon NHT. The RMP designates visual resource management for both the Oregon NHT and the Snake River Canyon as VRM Class II. Figure 5.3-4 shows the location of the Sinker Butte AOI, the Segment 9 Revised Proposed Route, and the associated VRM Class II

lands. Figure 5.3-5 shows the location of the AOI area, the Segment 9 Revised Proposed Route/Route 8H, and the associated VRM Class II lands.

5.3.2.1 Other Routes Considered

Siting considerations for the part of the AOI crossed by the Segment 9 Revised Proposed Route/Route 8H are the same as for the South Oregon Trail AOI described in Section 5.3.1 above. In addition, the BLM, Owyhee Task Force, and Proponents focused on the specific crossing of the Snake River north of the Swan Falls Dam and closer to an existing transmission line crossing. The selected alignment results in crossing land managed for VRM Class II objectives that could not be avoided. The 2013 FEIS Proposed Routes for Segment 8 and 9 and Routes 8B and 9E would avoid the VRM Class II lands surrounding Sinker Butte AOI. In addition, Routes 8G, 9K, and the 2013 FEIS Segment 9 Preferred Route would avoid this area as they, like FEIS Route 9E, would avoid crossing the SRBOP in this area.

While no amendments would be needed for the No Action Alternative, not constructing the route would not meet the Project objectives.

5.3.2.2 Existing Landscape Conditions

The 15-mile-radius area surrounding the Segment 9 Revised Proposed Route/Route 8H crossing of Sinker Butte AOI is bisected from northwest to southeast by the Snake River and its many buttes (see Figure 5.3-4). North and east of the river, the topography is mostly flat, while to the south and west, it is more rolling and rises up to the Owyhee Mountains. After crossing the Snake River, the route travels through the SRBOP where the landscape is flat to undulating, interrupted by buttes and rock features. The route would parallel the Oregon NHT for much of its length within the AOI. Most of the area is undeveloped; however, there are large irrigated agricultural areas with many farms in the area where Ada, Canyon, and Owyhee Counties come together near Murphy and at other scattered locations. SR 78 passes northwest to southeast on the west side of the Snake River. SR 45, located on the east side of the river, intersects SR 78 at Walters Ferry. There are a number of small communities such as Murphy and Melba and much of the area on both sides of the river is part of the SRBOP. Sensitive viewers include motorists, local residents, and visitors to the SRBOP, historic trails, and historic sites. Scenic views along the Snake River adjacent to Sinker Butte, such as those represented by KOPs 1115 and 1352, are important to sensitive residential viewers. Visitors to the Oregon Trail would be less than half a mile from the Project at KOP C91, and approximately 1.12 miles away at KOP C1527. Views from KOP 1597 represent the views of residential viewers on Warrick Road, looking north toward Sinker Butte. Open, panoramic views of the rocky terrain of buttes adjacent to the Snake River canyon, with little human-made development, are considered to have moderate to high scenic quality. Aesthetic landscape elements in the middleground views have variations of form, line, color, and texture, which increase the scenic quality. Few visible human-made alterations are visible within the landscape, which enhances the scenic quality.

Appendix J, Attachment D, Figure D-12a represents the view of visitors to the Oregon NHT. The resource includes at least two swales at this location (8 feet wide and up to 10 inches deep) marked with Carsonite posts. A two-track road is within the swale.

The landscape at this location is flat to gently rolling in the foreground and middle-ground with a mesa visible in the distant background. The vegetation is dominated by sagebrush with no high vertical elements.

Appendix E, Figure E.2-14a represents those views from KOP 1337 of recreational viewers at a scenic lookout adjacent to Swan Falls Dam looking southeast toward Sinker Butte across the Snake River. Open panoramic views of the rugged canyon terrain and meandering water feature are considered to have high scenic quality due to the variety in form, line, color, and texture as well as the scarcity of such views in the surrounding region.

Attachment B, Figure B-8 shows the existing conditions as viewed from KOP 1115.

5.3.2.3 Conformance Analysis

Figure 5.3-4 shows the viewshed, KOPs, and other features within the 15-mile-radius study area used to establish the degree of consistency of the proposed transmission line with the existing VRM Class II land crossed for the Segment 9 Revised Proposed Route. Appendix J, Attachment D, Figure D-12b simulates the view of visitors to the NHT or users of the two-track road that is aligned with the trail at this location. The Segment 9 Revised Proposed Route/Route 8H would be visible in the middleground as a new vertical element in the landscape. There would be little to no screening from landscape elements at this location. Appendix E, Figure E.14-2b simulates the view for high-sensitivity recreational viewers visiting the overlook above Swan Falls Dam at KOP 1337 who would have a moderate level of Project visibility from approximately 1.3 miles away, looking southwest toward the Revised Proposed Route/Route 8H, which represents a foreground view. The presence of the existing transmission lines and Sinker Butte in the view toward Segment 9 would result in co-dominant Project elements and partial screening, resulting in contrast levels that would be moderate. Visual impacts on recreational viewers would be moderate due to distance and contrast levels.

As viewed from KOPs 1115, 1352, C1514, and C1527, the landscape around AOI BOP-2 exhibits little diversity in form, line, color, and texture. Views of the Snake River are not apparent from this area. Residential viewers at KOP 1115 would have low-moderate impact to their views due to distance and partial screening. The proposed structures and access roads would result in low to moderate contrast with the undulating to flat terrain with blocky mesas and uniform vegetation and would not draw the attention of the casual observer from locations such as KOP 1352 over a mile away from the line. In this particular area, the distance of the Project from the viewer is an important factor impacting contrast levels but would still not meet VRM Class II objectives. Visual impacts to cultural resources on the Oregon NHT would occur and are represented by KOP C91; viewers on the trail would be less than half a mile from the Project. In addition, residential viewers on Warrick Road (KOP 1597) would have a high level of Project visibility, and visual contrast levels would be high due to the few human-made alterations and distance of the Project alignment. The rolling topography in the vicinity as well as distant mountainous silhouettes may offer opportunities for backdropping, which could absorb the lattice structures and lower contrast levels but not likely from this close distance. Visual impacts on viewers would be high.

If the Segment 9 Revised Proposed Route/8H is selected, structures should be microsited to minimize the visibility from the VRM Class II area. A 500-kV powerline would not be compatible with VRM Class II objectives. If this route is selected, it is recommended that the VRM Class II areas associated with the Snake River Canyon and Sinker Butte scenic areas that would be crossed by the route be reclassified to be managed with VRM Class III objectives.

5.3.2.4 Plan Amendment for Segment 9 Revised Proposed Route/Route 8H

Due to the proximity of the Oregon NHT, there is a potential for a fairly high visual impact from this route and therefore it would not conform to the VRM Class II objectives. An amendment would be needed for this routing under Alternatives 1, 6, and 7. If this route is selected, it is recommended that an area 250 feet from the centerline of the transmission line be reclassified to VRM Class III. This corridor would maintain a distance of at least 0.5 mile around the NHT, except where it crosses the trail. Micrositing should be used to lessen visual impacts as much as possible.

5.3.3 AOI BOP-3 Guffey Butte (Segment 9 Revised Proposed Route/Route 8H)

The Guffey Butte AOI is located about 10 miles east of Hemingway Substation where several proposed and additional routes for Segments 8 and 9 of the 2013 FEIS come together. The Segment 9 Revised Proposed Route (Alternative 1)/Route 8H (Alternatives 6 and 7) crosses the Guffey Butte AOI. This AOI is where the route crosses an 11,517-acre parcel of VRM Class II lands for 5.6 miles. This alignment is south of the area crossed by the 2013 FEIS Proposed Route for Segment 8 (which crossed the parcel for 4.2 miles), just south of FEIS Route 9D (which crossed the parcel for 3.7 miles) and similar to, but just north of, FEIS Route 9G (which crossed the parcel for 5.3 miles).

Figure 5.3-6 shows the viewshed for the Segment 9 Revised Proposed Route/Route 8H. Figure 5.3-7 shows the location of the Guffey Butte AOI, the Segment 9 Revised Proposed Route/Route 8H, and the VRM Class II lands with amendment management recommendations.

5.3.3.1 Other Routes Considered

The 2013 FEIS discussed the rationale for the alignments for routes crossing the SRBOP. Constraints considered in the development of those routes included avoiding areas of increasing development north of the Snake River, Centennial Park, and visual impacts to the Snake River and provide alternate routing if FEIS Route 8E was selected. Other concerns involved avoiding non-motorized areas and maximizing use of public land. Crossing of land managed for VRM objectives would be avoided by selecting Route 9K (Co-Preferred Alternative 5, and Alternative 3) or FEIS Proposed 9 (Co-Preferred Alternative 2 and Alternative 4), which avoid crossing the SRBOP in this area.

While no amendments would be needed for the No Action Alternative, not constructing the route would not meet the Project objectives.

5.3.3.2 Existing Landscape Conditions

The 15-mile-radius area surrounding the Guffey Butte AOI is bisected from northwest to southeast by the Snake River. North and east of the river, the topography is mostly flat, while to the south and west it is more rolling and rises up to the Owyhee Mountains. Most of the area is undeveloped; however, there are large irrigated agricultural areas with many farms in the area where Ada, Canyon, and Owyhee Counties come together near Murphy and at other scattered locations. SR 78 passes northwest-southeast through the area on the west side of the Snake River. SR 45, which is located in the northwestern part of the study area, intersects SR 78 at Walters Ferry. There are a number of small communities such as Murphy and Melba, and much of the area on both sides of the river is part of the SRBOP.

This route would cross undulating terrain containing buttes and other rock features. The alignment would cross north of the town of Murphy as well as land near Murphy Rim. KOP C132 is looking northwest towards the alignment for Segment 9 Revised Proposed Route. The foreground and middleground are flat with buttes and undulating landforms in the background.

Appendix E, Figure E.1-1a illustrates the existing landscape as viewed from KOP C132 with flat terrain in the foreground and middleground and buttes and undulating landforms in the background. There is minimal evidence of human disturbance.

Appendix E, Figure E.1-2a illustrates the existing landscape as viewed from KOP C133. This KOP is located on the eastern branch of a segment of the Oregon NHT – South Alternate route within the SRBOP, approximately one mile north of where it forks, following Rabbit Creek to the northeast. This portion of the trail continues north following Rabbit Creek. The KOP is approximately 0.2 mile south of the nearest tower for the Segment 9 Revised Proposed Route.

Appendix J, Attachment D, Figure D-7a represents the view from the NHT where the line would cross. The resource includes a subtle swale, measuring 3 inches deep and 6 feet wide, with some braiding (see Appendix J). The foreground is flat to subtle rolling topography with scattered shrubs and low grasses while the middle and distance are dominated by the mesa topography with low vegetation. No strong vertical features are present in the landscape.

Attachment B, Figure B-9 shows another view from KOP C90 emphasizing the Oregon Trail ruts.

5.3.3.3 Conformance Analysis

Figure 5.3-6 shows the viewsheds, KOPs, and other features within the 15-mile-radius study area used to establish the degree of consistency of the proposed transmission line with the existing VRM Class II land crossed. Appendix E, Figures E.1-1b and E.1-2b simulate the Segment 9 Revised Proposed Route/8H in the existing landscape as viewed from KOPs C132 and C133, respectively. Due to the Project's proximity to these KOPs and the introduction of new elements to the resource's viewshed to the north, the VCR for this KOP is assessed as strong. The proposed Project elements from this alignment may dominate the setting or may draw the attention of the casual observer; therefore, there would be an adverse impact to the resource from the

Segment 9 Revised Proposed Route/Route 8H at this location. Appendix J, Attachment D, Figure D-7b simulates the view from faint swales where it crosses the NHT at KOP C1415. The line would be highly visible at this location, with the nearest tower approximately 400 feet away. The towers and conductors would attract the attention of the casual observer and would contrast with the existing elements. One tower would be in the near middleground while another would be skylined along the ridge of a nearby mesa.

Scenic views in the Striker Basin of Guffey Butte and the surrounding mountainous terrain are important to sensitive viewers such as hikers at the BLM trailhead (KOP 561) and the adjacent residences. From this vantage point, views of the Project would be partially screened, however, the Revised Proposed Route would still not conform to VRM Class II objectives due to some skylining structures that would be apparent in the middleground of the view. It would also contrast with the undulating silhouette lines and mottled vegetation. The alignment would cross north of the town of Murphy and could be visible along Murphy Rim. Additionally, the alignment would parallel NHTs and cross VRM Class II lands near historic sites (see Figure 5.3-7). The structures for the Segment 9 Revised Proposed Route would contrast with the pyramidal forms as well as the flat to rolling expanse of the existing landscape. Contrast with form and texture as well as proximity to historic sites would draw the attention of the casual observer, thus not conforming to VRM Class II objectives.

5.3.3.4 Plan Amendments for Segment 9 Revised Proposed Route/Route 8H

If the Segment 9 Revised Proposed Route (Alternative 1)/Route 8H (Alternatives 6 and 7) is selected, an amendment would be needed for the Project to comply with the SRBOP RMP. A 500-kV powerline would not be compatible with VRM Class II objectives; therefore, a corridor 250 feet from the centerline of the proposed powerline would be established with a Class III VRM. This corridor would maintain a distance of at least 0.5 mile from the NHT, except where it crosses the trail. Micrositing may be needed to ensure a proper buffer distance from the NHTs. If the route is selected, it is recommended that the Proponents be required to microsite structures to minimize the visibility.

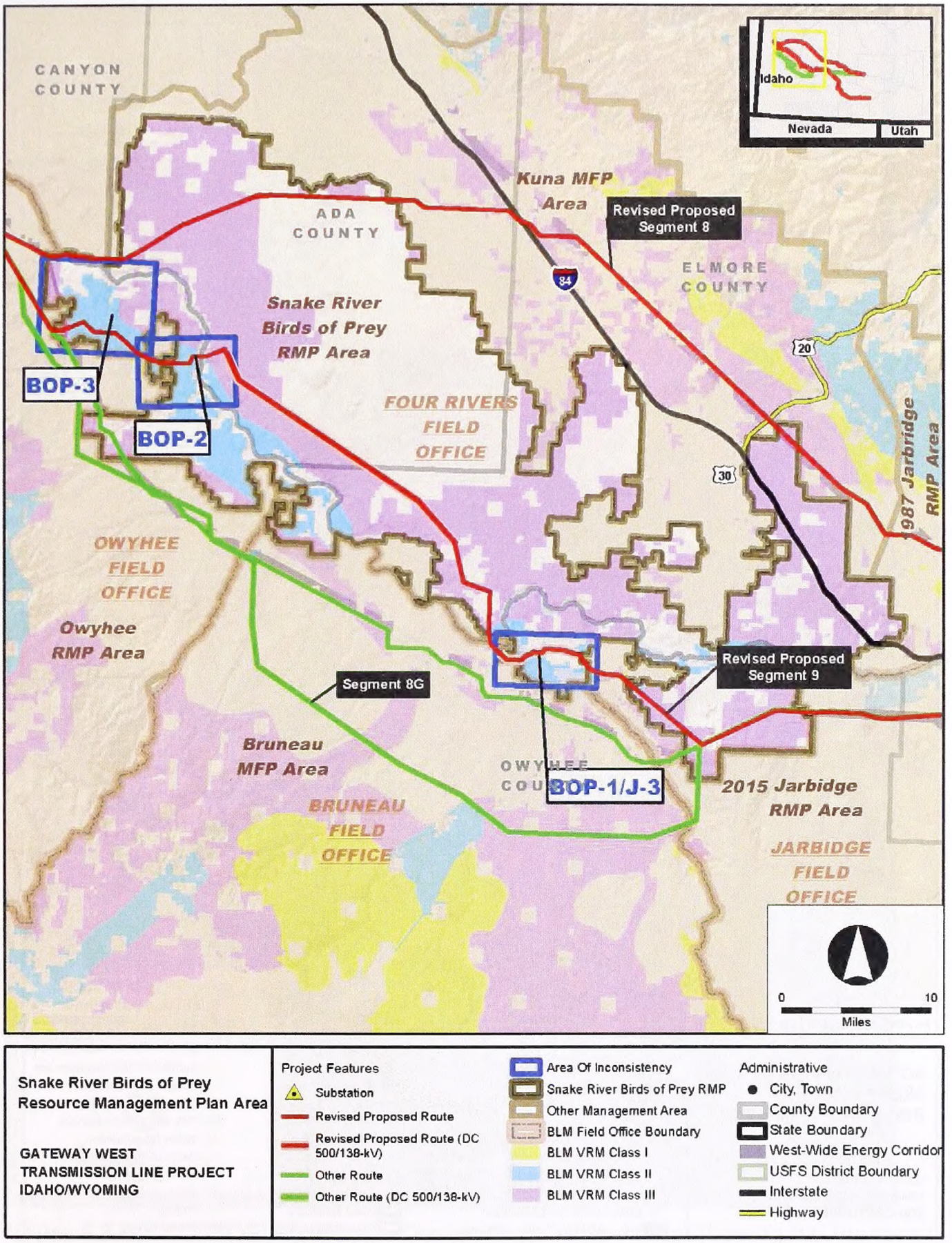


Figure 5.3-1. SRBOP RMP Boundary Map

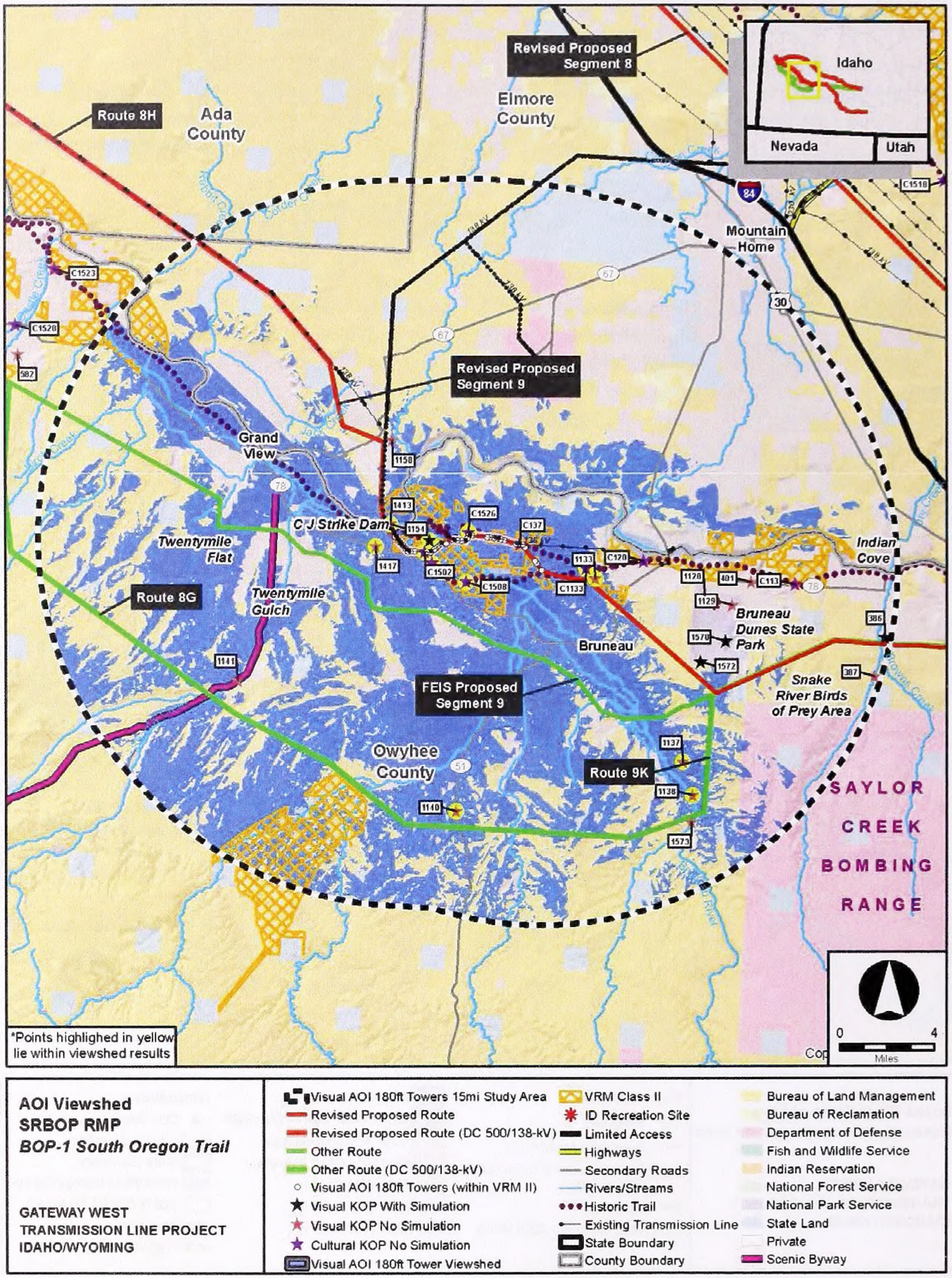


Figure 5.3-2. AOI BOP-1/J-3 South Oregon Trail Visual Analysis for the Segment 9 Revised Proposed Route/Route 8H

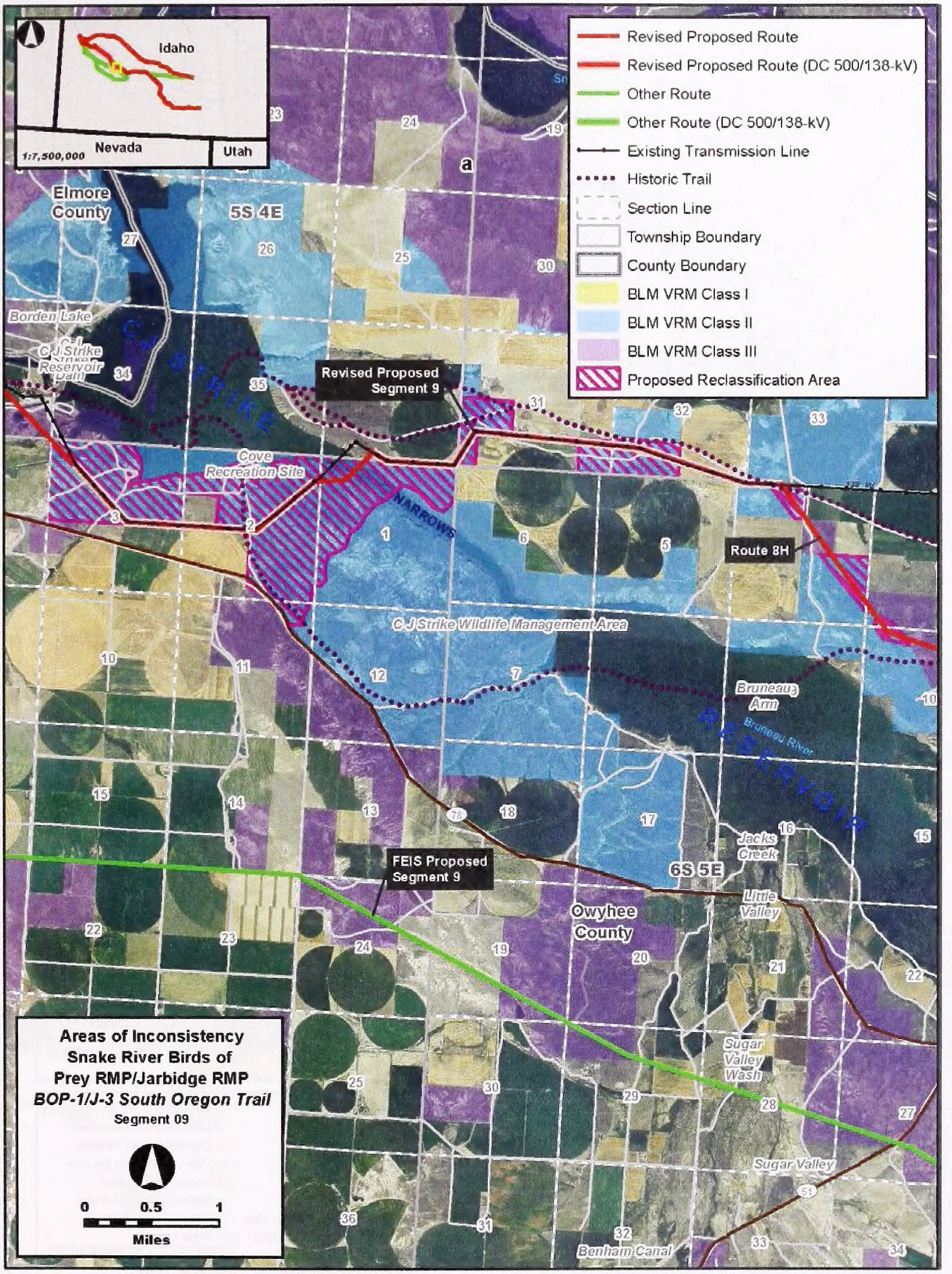


Figure 5.3-3. AOI BOP-1/J-3 South Oregon Trail Detailed Map Showing the Proposed VRM Action for Amendment SEIS-18 within the SRBOP RMP Planning Area

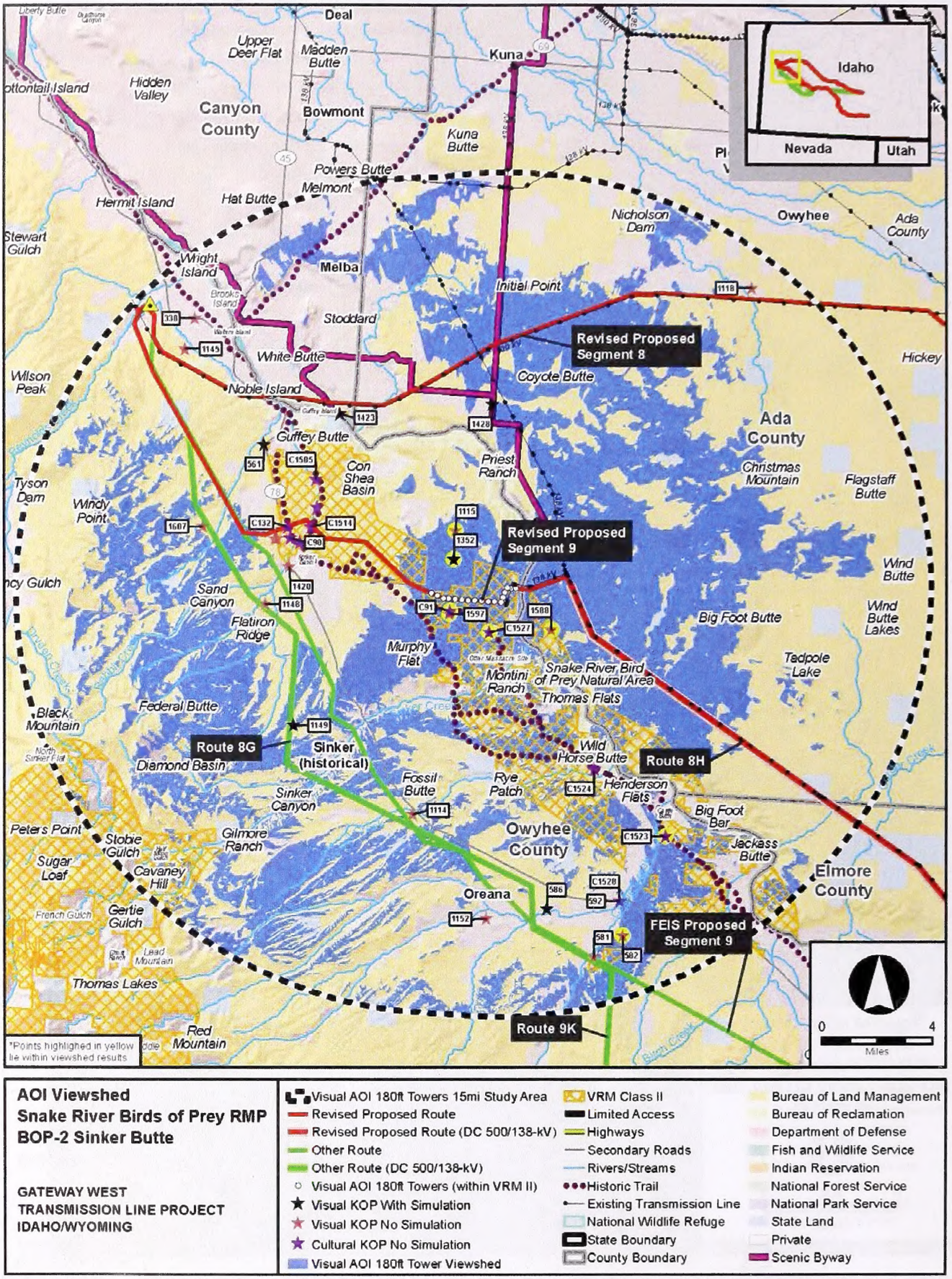


Figure 5.3-4. AOI BOP-2 Sinker Butte Visual Analysis for the Segment 9 Revised Proposed Route/Route 8H

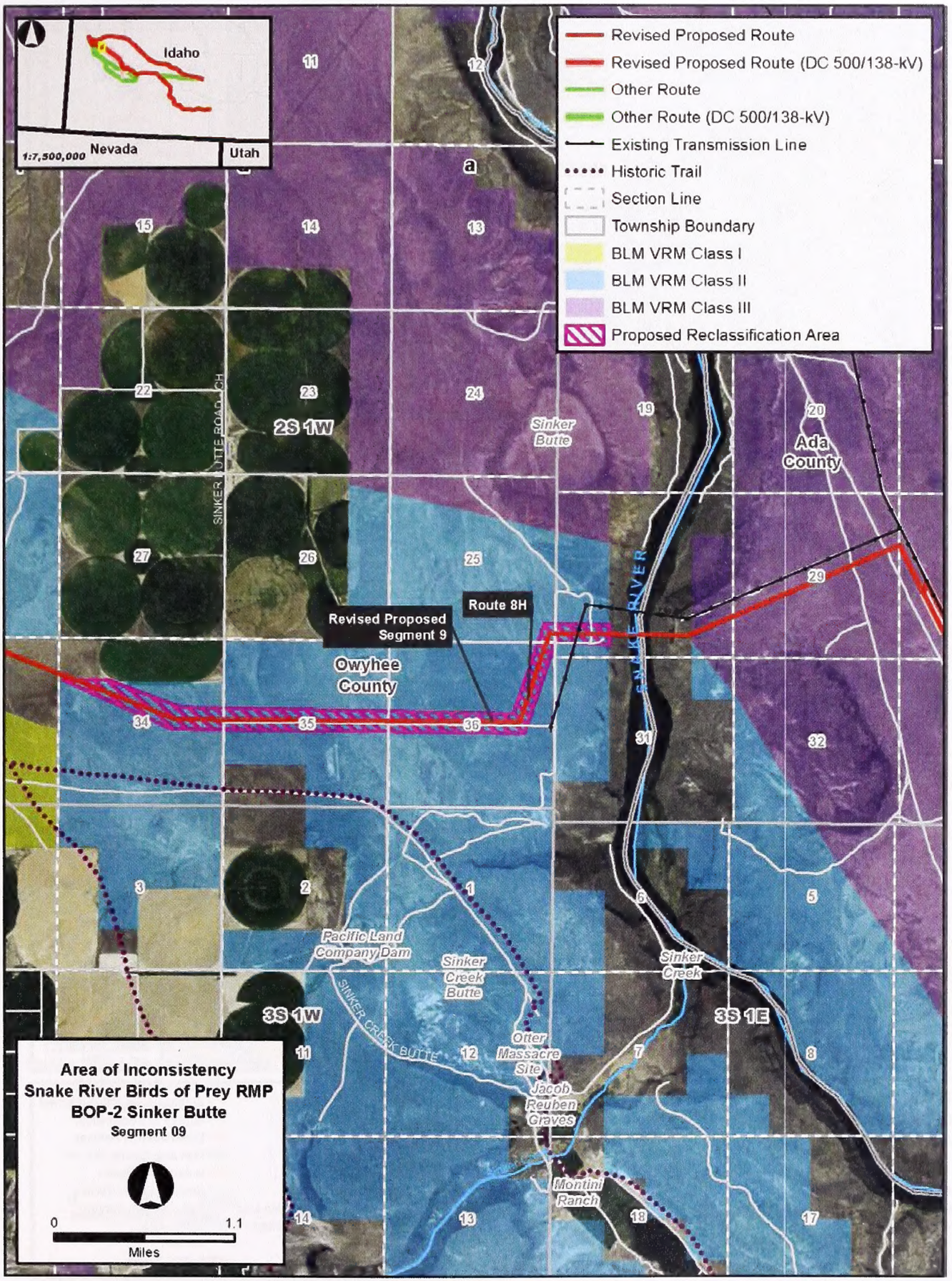


Figure 5.3-5. AOI BOP-2 Sinker Butte Detailed Map Showing the Proposed VRM Action for Amendment SEIS-15 within the SRBOP RMP Planning Area

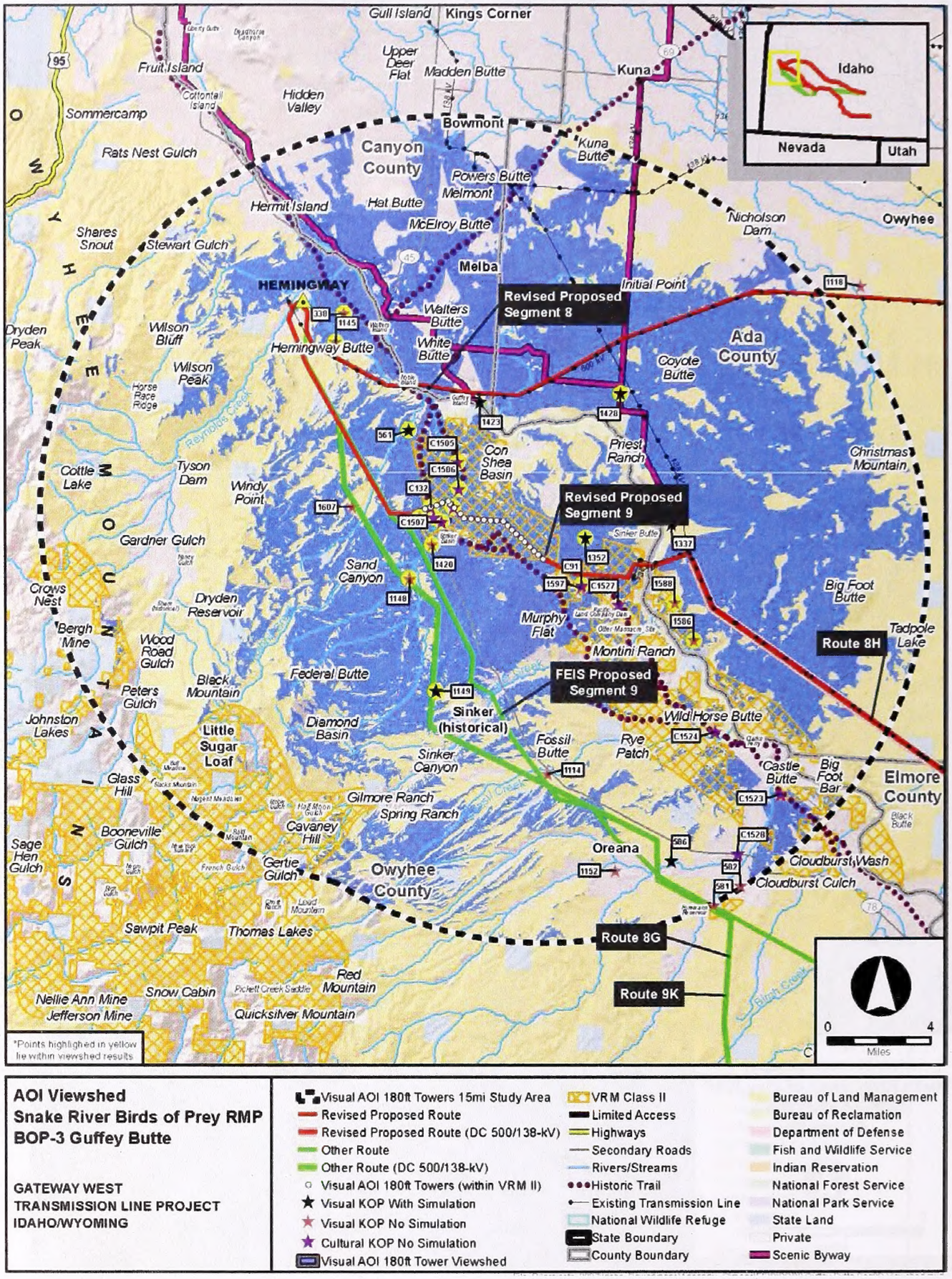


Figure 5.3-6. AOI BOP-3 Guffey Butte Visual Analysis for the Segment 9 Revised Proposed Route/8H

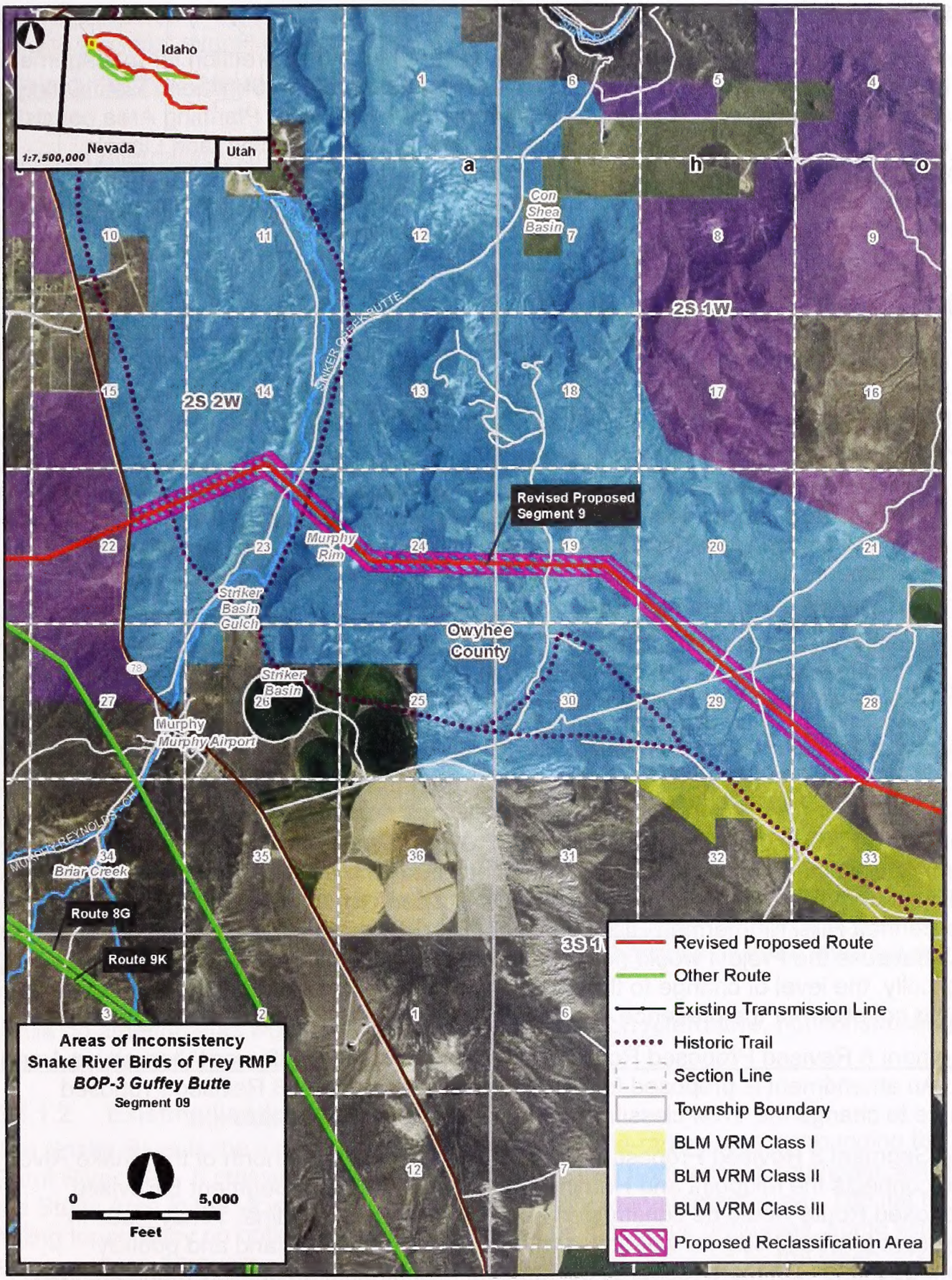


Figure 5.3-7. AOI BOP-3 Guffey Butte Detailed Map Showing the Proposed VRM Action for Amendment SEIS-15 within the SRBOP RMP Planning Area

5.4 Bennett Hills/Timmerman Hills MFP

The Bennett Hills/Timmerman Hills MFP (BLM 1980) provides direction for management of Public Land within its boundaries under the jurisdiction of the Shoshone Field Office in south-central Idaho. The Bennett Hills/Timmerman Hills MFP Planning Area consists of approximately 892,000 acres in Blaine, Camas, Elmore, Gooding, and Lincoln Counties (see Figure 5.4-1). The Bennett Hills/Timmerman Hills MFP includes objectives and recommendations for the following activities: lands, minerals, recreation, wildlife, range management, and watershed management.

The MFP includes Recreation Objective R-4, with a stated goal to "Manage the visual resources within the Planning Area in conformance with the guidance in BLM Manual 63l0.l8 B-E." BLM Manual 6310.18 states that the cited guidance is to be used as tentative minimum management objectives. If these objectives can be met, no further or more detailed objectives are considered necessary. The following classifications appear in the MFP, which are equivalent to the BLM visual classes presented in Section 1.0 of this appendix.

> "R-4.1 VRM Class II As a guideline, no management activity should be allowed to cause any evident changes in the form, line, color, or texture that is characteristic of the landscape within Class II areas, utilizing concealment, repetition of elements, minimizing surface disturbance, etc. to meet the goal.
>
> R-4.2 VRM Class III As a goal, management activities may cause changes in the basic elements (form, line, color, texture) of the characteristic landscape, but the changes should remain subordinate to the existing visual character. Incorporate the methodology outlined in BLM Manual 6320 Visual Resource Contrast Rating.
>
> R-4.3 VRM Class IV Changes caused by management activities may subordinate the original character but should reflect what could be a natural occurrence within the characteristic landscape."

Approximately 15.7 miles of the Segment 8 Revised Proposed Route would cross BLM-administered land managed under the Bennett Hills/Timmerman Hills MFP, 6.5 miles of which cross VRM Class II lands, which would not conform to the VRM objectives within the Bennett Hills/Timmerman Hills MFP. AOI BH-1 Burnt Ridge was identified as an AOI because the Project would not conform to VRM Class II objectives for this area. Typically, the level of change to the characteristic landscape in VRM Class II areas would not allow for the presence of a transmission line.

Segment 8 Revised Proposed Route (Co-Preferred Alternative 2, and Alternatives 1 and 3): An amendment is proposed for AOI BH-1 for the Segment 8 Revised Proposed Route to change the VRM classification from VRM Class II to Class III.

The Segment 8 Revised Proposed Route is a 129.7-mile route north of the Snake River that connects the Midpoint and Hemingway Substations. The Segment 8 Revised Proposed Route would be constructed as single circuit 500-kV line. A key issue in Segment 8 is balancing between disturbing private agricultural land and publicly managed land with more resource constraints. Constraints on publicly managed land include historic trails, wetlands, steep slopes, and raptor nests. An important siting factor was following existing transmission line corridors. Of the several existing east-

west transmission lines, the Revised Proposed Route follows the existing transmission line with the least overall impact.

Additional Routes: None of the other routes analyzed in the SEIS cross this Field Office.

No Action Alternative: Under the No Action Alternative, the Project would not be constructed. Therefore, Project objectives would not be met, but no Project-related plan amendments would be required.

5.4.1 AOI BH-1 Burnt Ridge (Segment 8 Revised Proposed Route)

The Burnt Ridge AOI is in the vicinity of King Hill, Idaho. It is located approximately 30 miles northwest of Midpoint Substation and approximately 3 miles north of Interstate 84. Much of the Segment 8 Revised Proposed Route in this area was located parallel to existing 230-kV transmission lines. This section of the route, however, also follows portions of the Oregon NHT. The Burnt Ridge AOI passes through four separate parcels of BLM-administered land managed for VRM Class II, ranging in size from 27 acres to 8,249 acres. The Project would cross a total of 6.5 miles of VRM Class II-managed land within the AOI. Figure 5.4-2 shows the location of the Burnt Creek AOI, the location of the Proposed Route, and the VRM management classification.

5.4.1.1 Other Routes Considered

Segment 8 was analyzed in the FEIS with the Proposed Route and five additional feasible routes. The Proponents attempted to avoid residential and agricultural land and to follow the WWE corridor or existing transmission lines when determining the route for Segment 8. The 2013 FEIS Route 8A followed a WWE corridor and would not cross the area managed under the Bennett Hills/Timmerman Hills MFP. The SEIS Routes 8G and 8H would proceed due west, into the Jarbidge RMP Planning Area, and would not cross the Bennett Hills/Timmerman Hills Planning Area. SEIS Route 8H follows the 8G alignment in this area and would therefore also not cross the Bennett Hills/Timmerman Hills Planning Area, but would cross VRM Class II land managed under the 1987 Jarbidge RMP and SRBOP RMP. In making a balanced routing decision that led to the selection of the proposed and other routes, crossing VRM Class II areas was unavoidable without causing greater overall effects. This AOI occurs for the Co-Preferred Alternative 2 and Alternatives 1 and 3 because all three alternatives include the Revised Proposed Route for Segment 8.

While no amendments would be needed for the No Action Alternative, not constructing the route would not meet the Project objectives.

5.4.1.2 Existing Landscape Conditions

The Snake River is the major water feature in the 15-mile-radius area surrounding the Burnt River AOI. It crosses the southern half of the area from west to southeast, leaving the Study Area in the vicinity of the Hagerman Wildlife Management Area. The flat to rolling topography on both sides of the river is cut by numerous drainages, some with steep, canyon-like walls. The northern part of the area is occupied by the steep terrain of the Mount Bennett Hills. Much of the area in the north is undeveloped. There are large areas of farmland along the Snake River in the southeast as well as Deadman

Flat, Black Mesa, and Pasadena Valley. Interstate 84, the major road in the area, passes east and then southeast through the Study Area. US 26 crosses the study area from east to west; and US 30 crosses north to south. Along these highways and the rivers there are a number of communities including Glenns Ferry, Bliss, and Hagerman. A number of historic trails cross the lower southwest half of the Analysis Area. A swale with shallow ruts is visible as part of the North Alternate Oregon Trail from KOP C85. Wooden H-frame towers are present within 0.25 mile south of KOP C85 and a single wood-pole transmission line is located 2.5 to 3 miles to the north. Numerous transmission lines run southeast to northwest through this area. In addition to the highways and communities, potential viewing areas include recreation areas such as Three Island Crossing State Park.

Attachment A, Figure BH-1a shows existing landscape conditions as viewed from KOP C84, which is located on a segment of the North Alternate Oregon Trail and is 0.8 mile southwest of the Segment 8 Revised Proposed Route. In this area, the trail is a two-track road that has been deepened by modern use. The setting contains a wooden, H-frame transmission line and ranching structures within 0.5 mile from the KOP. The topography along the western portion of AOI BH-1 along Segment 8 ranges from essentially flat to severe and canyon-like along King Hill Creek.

Attachment A, Figure BH-1c shows the existing wood pole H-frame transmission line that would be paralleled, as viewed from KOP C85. This KOP is located along the North Alternate Oregon Trail and would be approximately 900 feet northeast of the Revised Proposed Route of Segment 8. South of the Segment 8 Revised Proposed Route, and moving east, there is a substantial amount of irrigated agriculture and development, whereas north of the segment there is more undeveloped land.

5.4.1.3 Conformance Analysis

Figure 5.4-3 shows the viewshed, KOPs and other features within the 15-mile radius study area used to determine the degree of consistency with the existing VRM classification. KOPs C8 and C85 were selected because they are located on the Oregon NHT where VRM Class II objectives were assigned to protect from visual intrusion. Thus, conformance between the Project and visual management goals may be directly assessed.

Attachment A, Figure BH-1b simulates landscape conditions showing the Segment 8 Revised Proposed Route as viewed from KOP C84. The Project's design shares some similarities with existing structures in the area but would introduce new elements that are of different form, material, and texture. Due to these factors, the KOP's proximity to the route, and the potential for the elements to blend into the backdrop, the VCR for this KOP is assessed as weak to moderate. The proposed Project elements may draw the attention of the casual observer; therefore, there would be an adverse impact to the resource at this location.

Attachment A, Figure BH-1d shows the Segment 8 Revised Proposed Route in relation to an existing H-frame transmission line from KOP C85. The Segment 8 Revised Proposed Route would be located just to the north and parallel to the existing wooden, H-frame transmission line. The Project's design shares some similarities with existing structures in the area, but would introduce new elements that are of different form,

material, and texture. Due to these factors and the KOP's proximity to the route, the VCR for this KOP is assessed as moderate. The proposed Project elements would draw the attention of the casual observer; therefore, there would be an adverse impact to the resource at this location.

Scenic views of Kings Crown and the surrounding area north of King Hill are important to the surrounding sensitive viewers such as sensitive viewers along the Oregon NHT at KOPs C84 and C85. Many of the views in this area, including these particular KOPs, are interrupted by development and human-made features such as high voltage transmission lines and wind towers. Human development has changed the surrounding form, line, and texture of the adjacent views, representing a deviation from the natural setting. From these KOPs it is apparent that there will be some skylining and that screening and other mitigation efforts would not substantially lower the impacts to scenic resources in the surrounding area. The sweeping terrain, undulating forms, strong horizon line, and mottled vegetation are interrupted by existing human development. Impacts to cultural views are considered to be moderate. However, from views in the foreground and middleground, the Proposed Project structures and access roads would draw the attention of the casual observer, and thus not conform to VRM Class II objectives.

5.4.1.4 Plan Amendment for Segment 8 Revised Proposed Route

Due to the number of transmission lines and other development in the vicinity, an amendment is proposed for the Segment 8 Revised Proposed Route (in Co-Preferred Alternative 2) to reclassify the area within 3,000 feet north of the existing transmission line ROW from VRM Class II to VRM Class III (including the existing ROW). This VRM designation will better reflect the visual resource conditions of the area and allow the Project to conform to the MFP visual objectives. This amendment would also apply if Alternative 1 or Alternative 3 were selected.

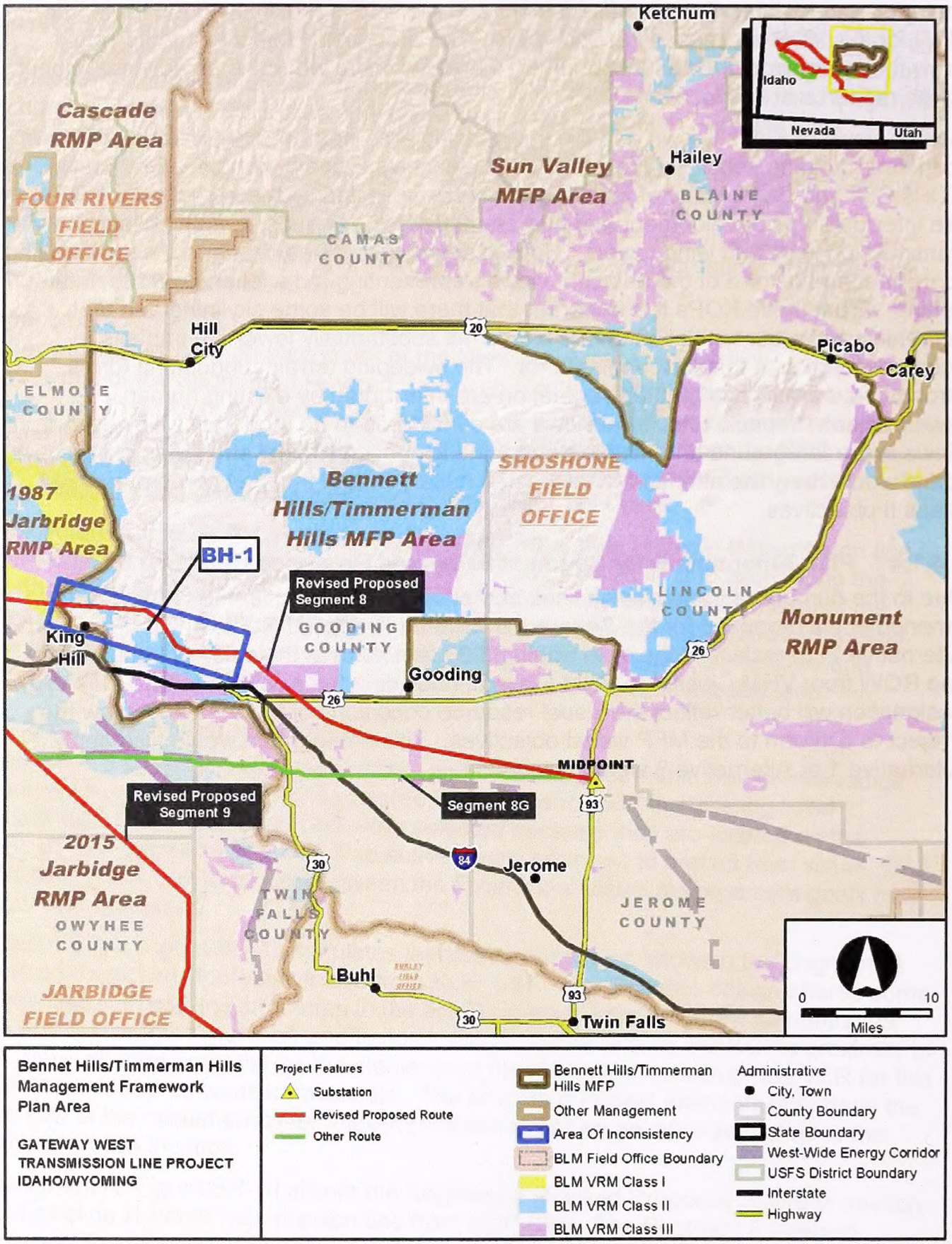
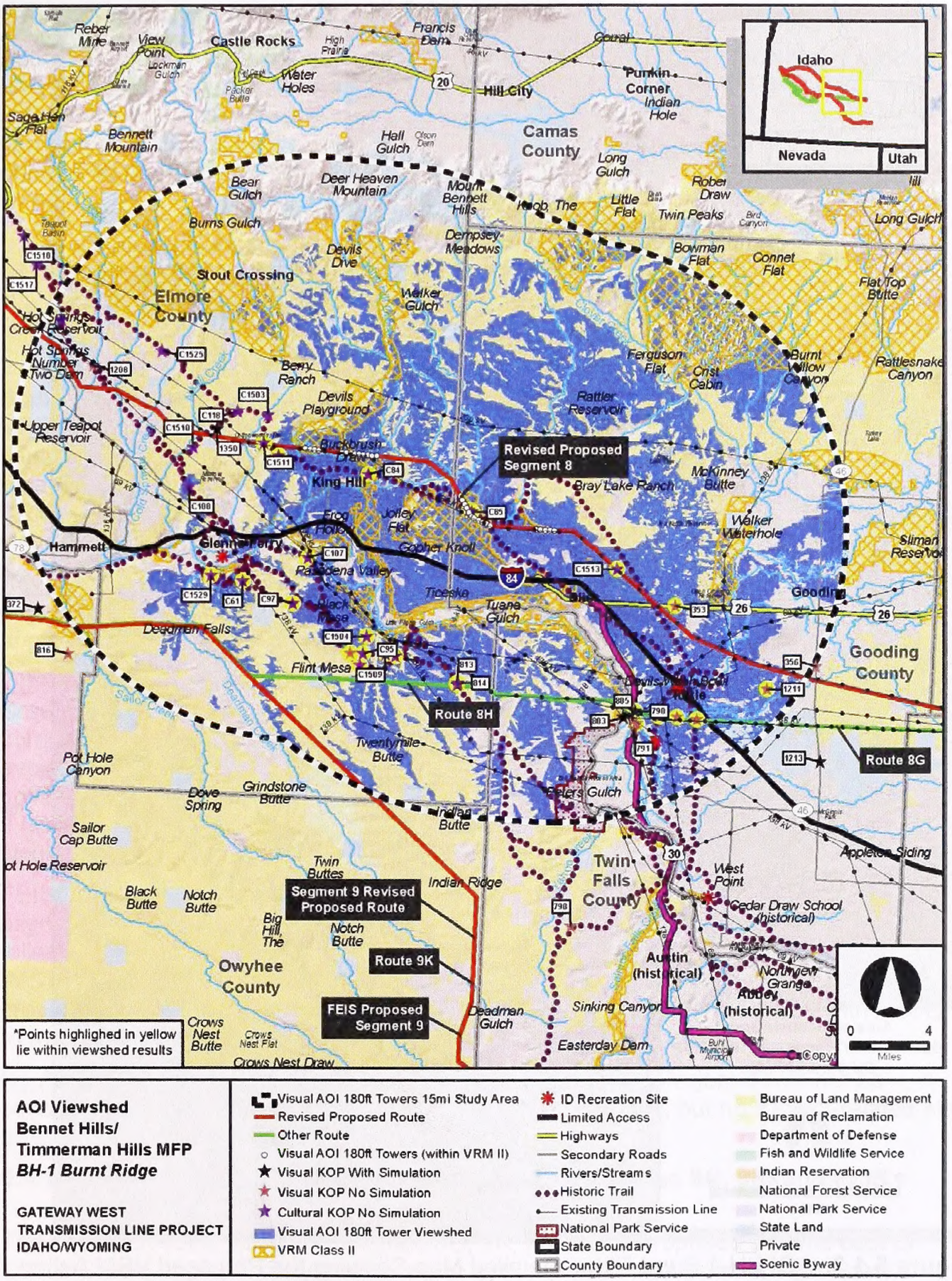


Figure 5.4-1. Bennett Hills/Timmerman Hills RMP Boundary Map



AOI Viewshed
Bennet Hills/
Timmerman Hills MFP
BH-1 Burnt Ridge

GATEWAY WEST
TRANSMISSION LINE PROJECT
IDAHO/WYOMING

- Visual AOI 180ft Towers 15mi Study Area
- Revised Proposed Route
- Other Route
- Visual AOI 180ft Towers (within VRM II)
- Visual KOP With Simulation
- Visual KOP No Simulation
- Cultural KOP No Simulation
- Visual AOI 180ft Tower Viewshed
- VRM Class II
- ID Recreation Site
- Limited Access
- Highways
- Secondary Roads
- Rivers/Streams
- Historic Trail
- Existing Transmission Line
- National Park Service
- State Boundary
- County Boundary
- Bureau of Land Management
- Bureau of Reclamation
- Department of Defense
- Fish and Wildlife Service
- Indian Reservation
- National Forest Service
- National Park Service
- State Land
- Private
- Scenic Byway

Figure 5.4-2. AOI BH-1 Burnt Ridge Visual Analysis for the Segment 8 Revised Proposed Route

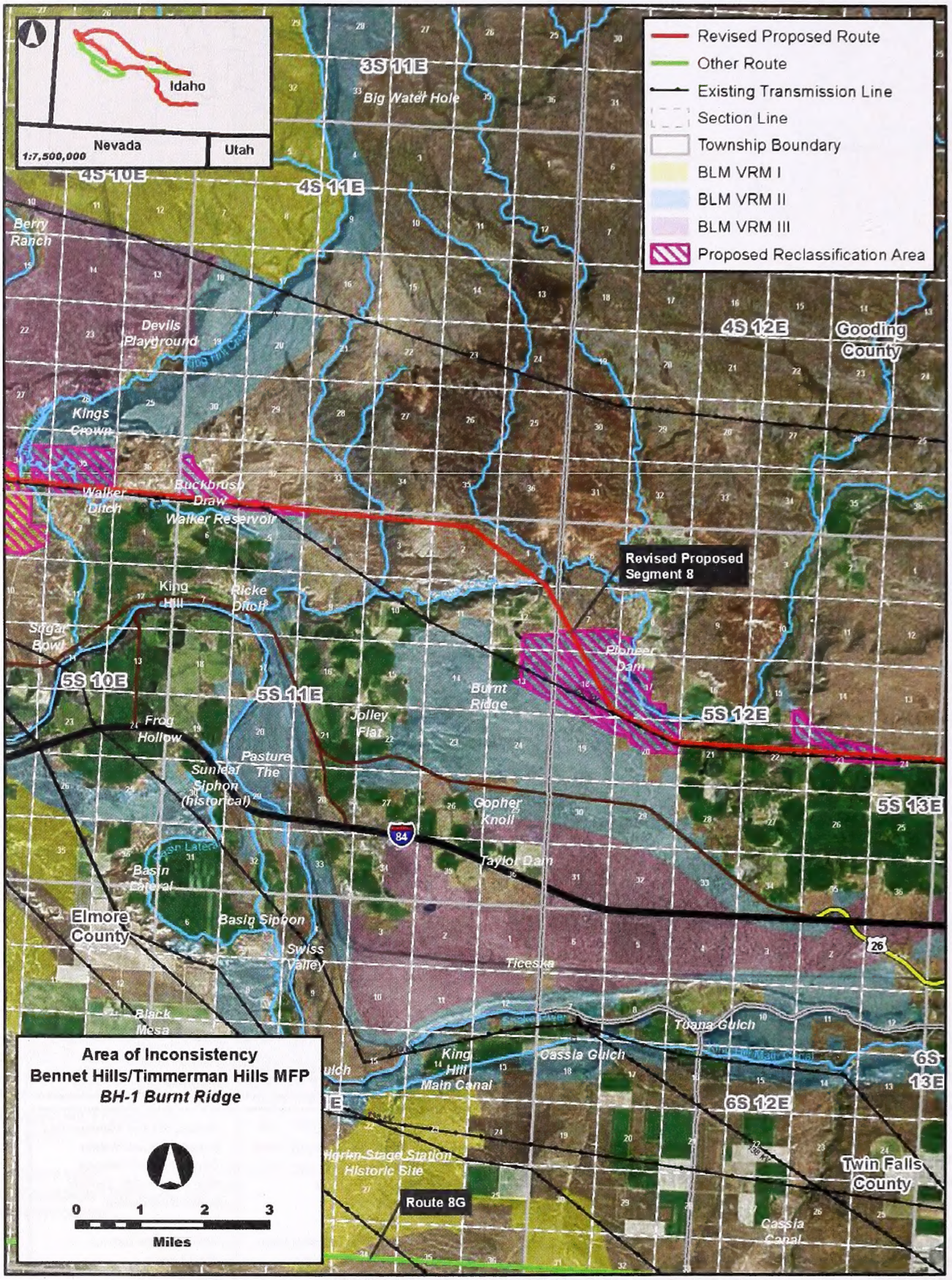


Figure 5.4-3. AOI BH-1 Burnt Ridge Detailed Map Showing the Proposed VRM Action for Amendment SEIS-9 within the Bennett Hills/Timmerman Hills MFP Planning Area

5.5 Bruneau MFP

Actions that occur on lands managed by the Bruneau Field Office, including the granting of ROW under Title V of the Federal Land Policy and Management Act of 1976, are guided by decisions recorded in the Bruneau MFP (BLM 1983b). The Bruneau MFP currently restricts impacts to visual resources. Thus, the proposed Project does not conform to the Bruneau MFP as currently written:

> "Manage all public lands in a manner which will protect and maintain the existing visual qualities, provide for enhancement where consistent with management policies, and provide for rehabilitation of land which presently do not meet the visual quality standards of surrounding lands. Use VRM contrast rating and project application design process for all management activities without unduly reducing commodity production or limiting program effectiveness."

Both of the Co-Preferred Alternatives would cross land managed under the Bruneau MFP. For Co-Preferred Alternative 2, FEIS Proposed 9 crosses an area of VRM Class II land within a Section 368 corridor but would still require an amendment for visual resources. For Co-Preferred Alternative 5, both Routes 8G and 9K would cross the VRM Class II parcel outside of the corridor and an amendment would be required for visual resources.

Revised Proposed Route: The Segments 8 and 9 Revised Proposed Routes do not cross the Bruneau Field Office, and therefore AOI analysis for the Bruneau MFP is not applicable.

Other Routes: Routes 8G and 9K cross a parcel of VRM Class II land near Castle Creek, just south of the WWE corridor. In general, Routes 8G and 9K follow the WWE corridor on BLM-managed lands but frequently change direction on private segments to avoid rural residences, the small communities of Murphy and Oreana and, as much as possible, cultivated lands. Approximately 0.3 mile of Route 8G would cross VRM Class II land while approximately 0.4 mile of Route 9K would cross the parcel. An amendment would be needed for AOI B-1 to reclassify the VRM designation if they are selected.

FEIS Proposed 9 crosses the same parcel of land as Routes 8G and 9K; however, this alignment crosses the VRM Class II area within the WWE corridor. Approximately 33 miles of FEIS Proposed 9 would cross the area in the Bruneau Field Office within the WWE corridor, 17.6 miles of which are on BLM-managed land and 0.17 mile of which crosses the AOI. This route would also require an amendment associated with AOI B-1 to reclassify the VRM designation if it is selected.

No Action Alternative: Under the No Action Alternative, the Project would not be constructed. Therefore, Project objectives would not be met, but no Project-related plan amendments would be required.

5.5.1 AOI B-1 Castle Creek (Segments 8 and 9 – Routes 8G, 9K, and FEIS Proposed 9)

The Bruneau AOI is located on Routes 8G, 9K, and FEIS Proposed 9 to the east of Castle Creek, approximately 2 miles south of the SRBOP management boundary. Routes 8G, 9K, and FEIS Proposed 9 would cross a 282-acre VRM Class II parcel for approximately 0.3 mile and 0.4 mile, respectively. This AOI is a relatively isolated

parcel of VRM Class II management within a larger landscape of extensive agriculture, including pivot-irrigation. Figure 5.5-2 shows the viewshed for the Castle Creek AOI; Routes 8G, 9K, and FEIS Proposed 9; and the VRM classifications lands.

The VRI lists the area crossed by Routes 8G, 9K, and FEIS Proposed 9 in this AOI as Scenic Quality Unit 004 – Birch Creek Wash, which has a Scenic Quality Rating of C with low viewer sensitivity. Approximately 9.2 miles of the route would cross this unit, 0.2 mile of which would be in the AOI of VRM Class II. The unit is approximately 125 square miles, 34 square miles of which would be within 5 miles of the route crossing of the AOI. The majority of the land that is within the VRI unit, managed under the Bruneau MFP and within 5 miles of the AOI, is VRM Class IV with some Class III and the Class II of the AOI.

5.5.1.1 Other Routes Considered

The Segments 8 and 9 Revised Proposed Routes and most of the other 2013 FEIS routes would avoid this AOI; however, the Segment 9 Revised Proposed Route would cross substantially more VRM Class II areas within the SRBOP. In the 2013 FEIS, Routes 9D through 9H would avoid this AOI. However, similar to the Revised Proposed Route for Segment 9, FEIS Routes 9D and 9F–9H would cross VRM sensitive lands within the SRBOP management area. FEIS Route 9E is south of this AOI and would not cross VRM Class I or II designated lands; however, very little of the route would be within the WWE corridor.

While no amendments would be needed for the No Action Alternative, not constructing the route would not meet the Project objectives.

5.5.1.2 Existing Conditions

The topography in the 15-mile-radius analysis area for AOI B-1 is defined by undulating to dominant ridges and buttes such as Sinker Creek Butte dissected by broad, open valleys and meandering water bodies such as Castle Creek and the Snake River. The central and northern portions of the area have a series of drainages and ridges running north and south into the Snake River. The areas to the southwest of the Snake River Valley are more rugged with severe slopes such as near Red Mountain and Hayden Peak. The majority of the area is extensively farmed with pivot irrigation. Murphy, the most significant community in the area, is located in the north quadrant on the west side of the Snake River. Highway 45, which generally parallels the Snake River, crosses the area from northwest to southeast. An existing transmission lines crosses north to south through the area. Sensitive viewing areas include the Oregon NHT, the Snake River, Snake River Canyon Scenic Byway, Western Heritage Historic Byway, Owyhee Uplands Back Country Byway, Celebration Park, Swan Falls, and residences in Murphy and in the adjacent agricultural areas along the Snake River Plain.

Attachment B, Figure B-10 shows existing landscape conditions as viewed from KOP 581. The landscape in the foreground is flat to gently sloping and covered with grasses and riparian vegetation adjacent to Castle Creek. Rolling to rugged hills, such as Red Mountain, are seen in the background. There are visible water elements and a few human-made modifications in view, including Castle Creek Road and farm outbuildings immediately adjacent to the viewer. KOP 581 would be approximately 300 feet

northeast of FEIS Proposed 9 and about 550 and 800 feet northeast of 8G and 9K, respectively. Attachment B, Figure B-11 shows existing landscape conditions looking through the AOI toward the route from KOP 582, approximately 1.3 miles northeast of Routes 8G and 9K, and 1.2 miles northeast of FEIS Proposed 9. The view shows the flat topography in the foreground and middleground with mountains and buttes in the distance.

This AOI is located in the Scenic Quality Rating Unit 004 – Birch Creek Wash of the Bruneau Field Office VRI. The area has a long history of motorcycle racing and past use by the military as a missile base. Sand washes drain to the northeast from higher elevation ranges towards the Snake River throughout. The area has some erosive land features created by sand wash erosion of the sediments left from ancient Lake Idaho deposition. Because of these sediments and soils, rare plants and habitat are common throughout the rating unit although they would not be apparent to the average visitor traveling through the unit. As viewed from the KOPs, the visual resources are generally of a stark and sparsely vegetated landscape. While there are unique, albeit subtle, biologic resources and landforms in this area, the abundance of past disturbances including abandoned military installations and livestock management structures (trough/pipelines and fencing) detract from the visual resources of this unit. In addition, the lack of precipitation (5 to 7 inches in this zone) to provide for a more lush appearing vegetation community and lack of rugged topographic features, in combination with the abundance of non-native plants or weeds, as viewed by the average visitor to the area, result in a Class C rating.

5.5.1.3 Conformance Analysis

Figure 5.5-2 shows the viewshed from AOI B-1, VRM Class II managed lands, and other features within the 15-mile radius study area used to assess the whether the proposed project conforms the existing VRM class. Scenic views of the various buttes throughout the Snake River Plain as well as distant mountain ranges are important to sensitive residential viewers or recreational users visiting portions of the Oregon NHT adjacent to KOP 581. KOP 581 is located on a segment of the Oregon NHT approximately 300 feet northeast of FEIS Proposed 9 and about 550 and 800 feet northeast of 8G and 9K, respectively, as they follow the Snake River in a southeast to northwest direction. The view from KOP 581 provided in Attachment B, Figure B-10 is not facing the AOI, but is viewing adjacent lands, directly south of the KOP. The views of the flat to undulating terrain, background mountain silhouettes with mottled to clumped vegetation, and meandering waterbody exhibits diversity in form, line, color, and texture with few human-made features. The setting at this KOP is relatively undisturbed in all directions, except for roadway and a few adjacent wooden structures. From this KOP, the proposed Project would be partially screened by the ridge but would still skyline the mountainous views. The close distance of the Project from KOP 581 results in the features dominating the landscape with such prominence that the visual contrast would be strong. The view from KOP 582 (Attachment B, Figure B-11) represents views from residences and Castle Creek/Oreana Loop Road, approximately 1.3 miles north-northeast of the alignment within the AOI, where drivers and residences would have a partially obstructed view of the Project.

Co-Preferred Alternative 2 and Alternative 6 would result in a single 500-kV line (along the FEIS Proposed 9 alignment) crossing the VRM Class II designated land near Castle Creek within the WWE corridor. This would introduce new dominant structural elements into the view to the north that would draw the attention of the casual observer, and would deviate from the natural form, line, color, and texture; therefore, it would not conform to VRM Class II objectives. Visual impacts of these Alternatives are likely to be similar to those for Alternatives 3 and 7, but less than those from Co-Preferred Alternative 5 or Alternative 4.

Co-Preferred Alternative 5 would result in two parallel 500-kV lines (Routes 8G and 9K), 250 feet apart, crossing VRM Class II designated land near Castle Creek just south of the WWE corridor. This would introduce new dominant structural elements into the view to the north that would draw the attention of the casual observer, and would deviate from the natural form, line, color, and texture; therefore, it would not conform to VRM Class II objectives. Visual impacts of this Alternative are likely to be similar to those of Alternative 4, but greater than those from Alternatives 2, 6, 3, or 7.

Alternatives 3 and 7 would result in a single 500-kV line (Route 9K) across VRM Class II designated land near Castle Creek just south of the WWE corridor. This would introduce new dominant structural elements into the view to the north that would draw the attention of the casual observer, and would deviate from the natural form, line, color, and texture; therefore, it would not conform to VRM Class II objectives. Visual impacts of these alternatives are likely to be similar to those for Co-Preferred Alternative 2 and Alternative 6, but less than those from Co-Preferred Alternative 5 or Alternative 4.

Alternative 4 would result in two parallel 500-kV lines (FEIS Proposed 9 and Route 8G), approximately 800 feet apart, crossing VRM Class II designated land near Castle Creek. FEIS Proposed 9 would be within the WWE corridor, while 8G would be just south of the corridor. This would introduce new dominant structural elements into the view to the north that would draw the attention of the casual observer, and would deviate from the natural form, line, color, and texture; therefore, it would not conform to VRM Class II objectives. Visual impacts of this Alternative are likely to be similar to those for Co-Preferred Alternative 5, but greater than those from Alternatives 2, 6, 3, or 7.

Visual effects of Co-Preferred Alternative 2 and Alternatives 6, 3, and 7 would be a result of a single 500-kV line crossing the AOI, while Co-Preferred Alternative 5 and Alternative 4 would both have two parallel 500-kV lines crossing the AOI. Appendix E, Figure E.2-9a shows the existing conditions at KOP 1149, which, while quite a ways west of the AOI, allows us to compare visual effects of different line configurations. Appendix E, Figure E.2-9b shows the simulated conditions of a single transmission line from KOP 1149. Figure E.2-9c shows the simulated conditions of two parallel transmission lines from KOP 1149. While this KOP is not in the AOI, it shows a general effect of the Project from a distance similar to the routes as KOP 581. It is assumed that VRM Class II objectives have been assigned to this particular area in order to protect the Oregon NHT corridor as well as adjacent scenic resources.

5.5.1.4 Plan Amendment for FEIS Proposed 9, Route 8G, and Route 9K

If FEIS Proposed 9 (Co-Preferred Alternative 2 and Alternatives 4 and 6), Route 8G (Co-Preferred Alternative 5 and Alternative 4), or Route 9K (Co-Preferred Alternative 5 and Alternatives 3 and 7) is selected, an amendment to reclassify the entire 282-acre parcel (the VRM Class II area adjacent to Castle Creek) from VRM Class II to Class III (Figure 5.5-3) would be needed. The WWE corridor crosses this area, and converting the area to VRM Class III would be consistent with the use of the land for a high-voltage transmission line ROW.

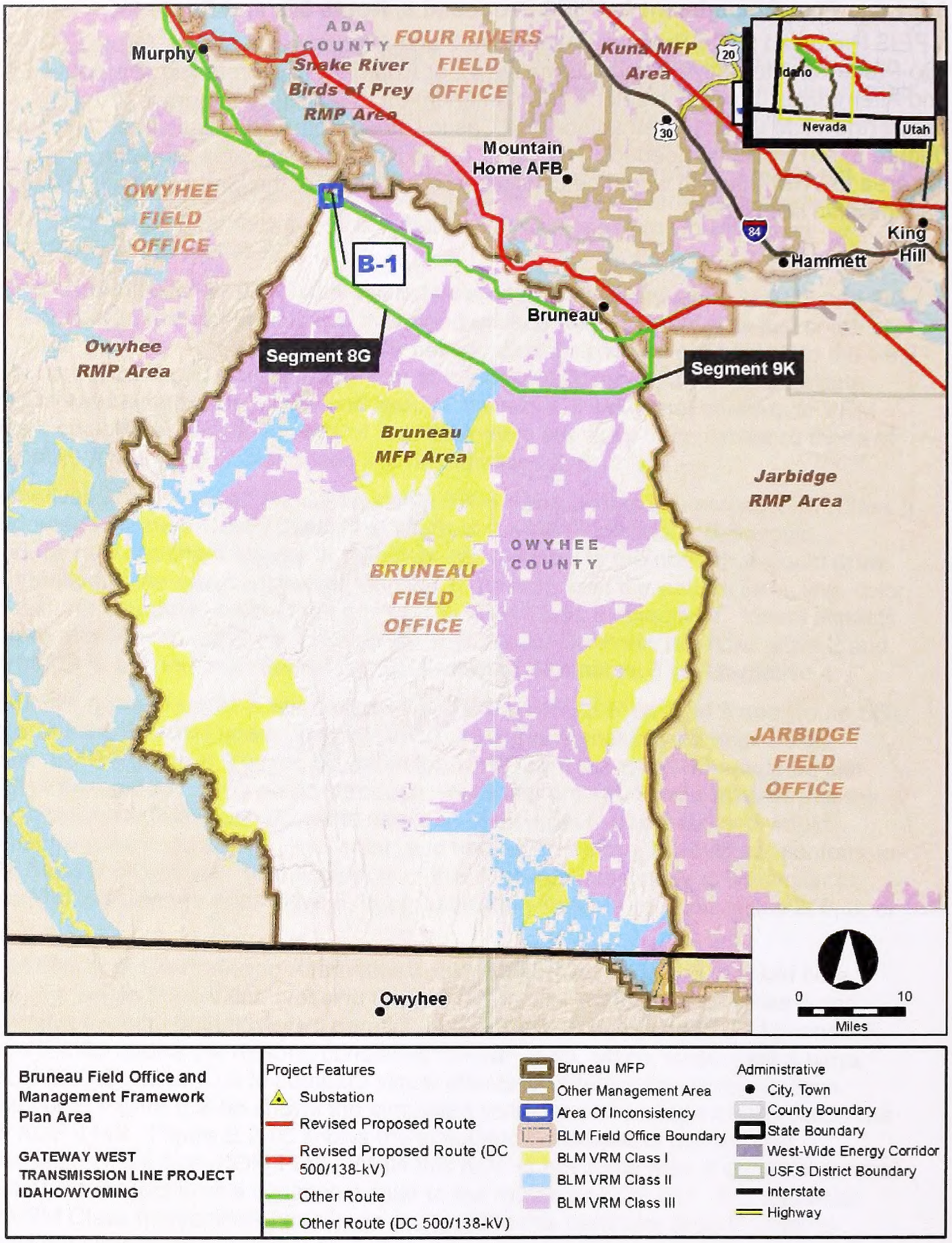


Figure 5.5-1. Bruneau MFP Boundary Map

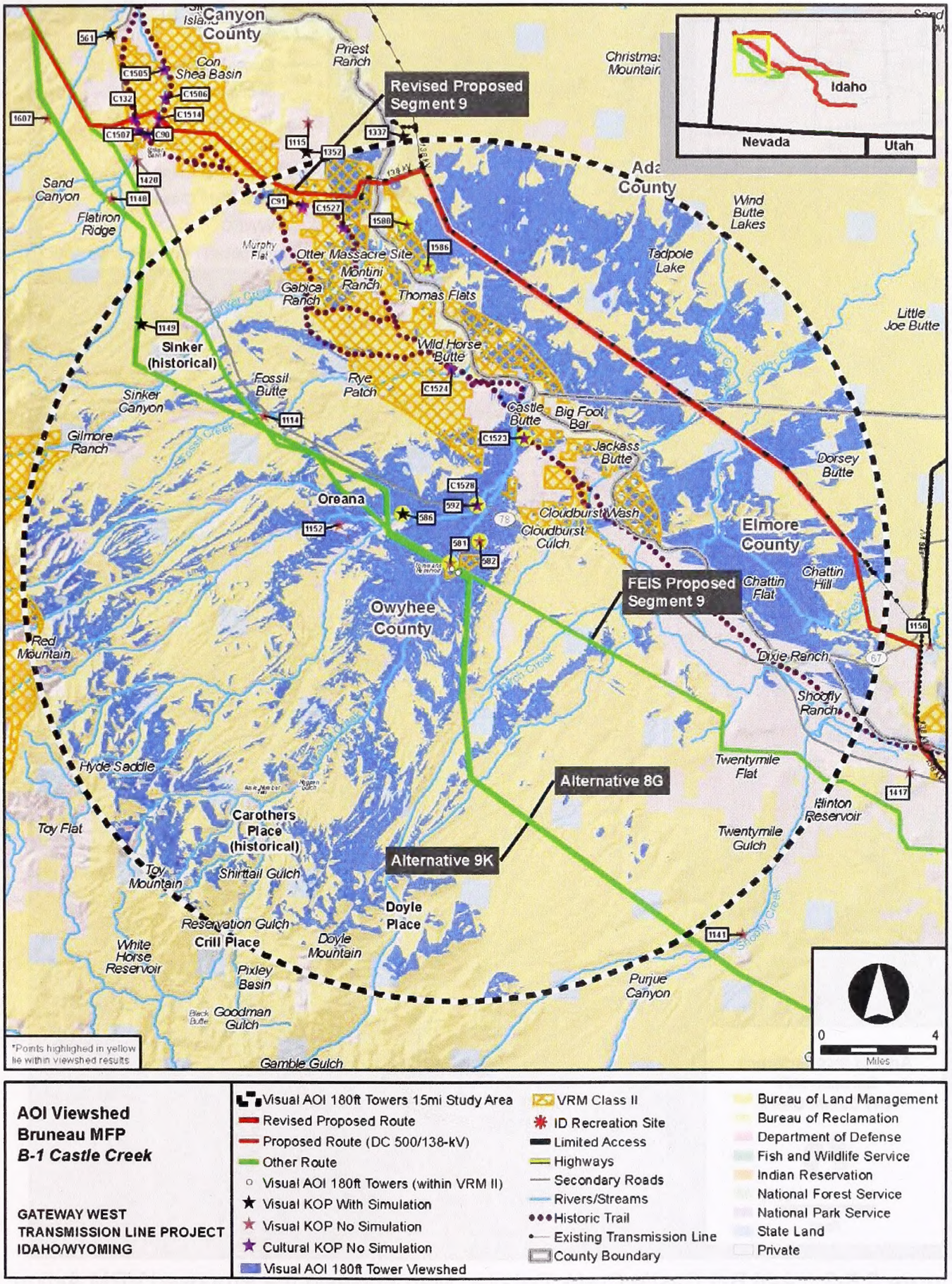


Figure 5.5-2. AOI B-1 Castle Creek Visual Analysis for Routes 8G and 9K

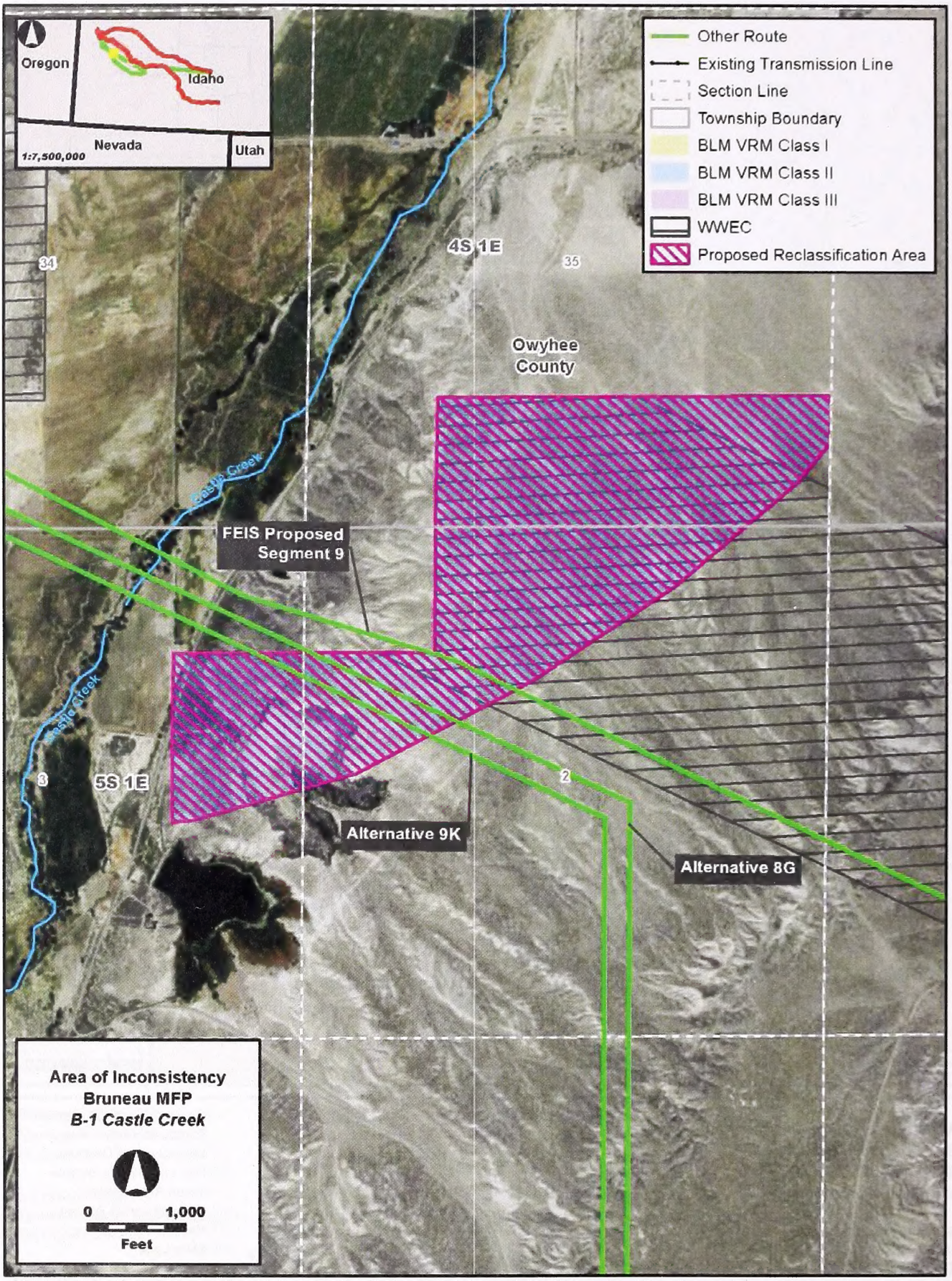


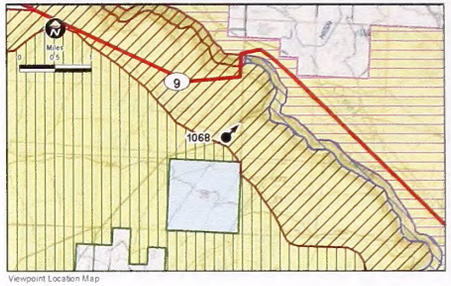
Figure 5.5-3. AOI B-1 Castle Creek Detailed Map Showing the Proposed VRM Action for Amendment SEIS-12 within the Bruneau MFP Planning Area

Attachment A

Existing Conditions and Photographic Simulations

List of Simulations by Appendix G Sections

Section	AOI/ Figure No.	KOP Number	Figure Title
5.1	TF-1a	KOP 1068	Existing Conditions, Revised Proposed Route Segment 9/Route 9K
	TF-1b	KOP 1068	Photographic Simulation, Revised Proposed Route Segment 9/Route 9K
	TF-1c	KOP 1065	Existing Conditions, Revised Proposed Route Segment 9/Route 9K
	TF-1d	KOP 1065	Photographic Simulation, Revised Proposed Route Segment 9/Route 9K
5.2	J-5a	KOP 1350	Existing Conditions, Revised Proposed Route Segment 8
	J-5b	KOP 1350	Photographic Simulation, Revised Proposed Route Segment 8
	J-5c	KOP C83	Existing Conditions, Revised Proposed Route Segment 8
	J-5d	KOP C83	Photographic Simulation, Revised Proposed Route Segment 8
5.4	BH-1a	KOP C84	Existing Conditions, Revised Proposed Route Segment 8
	BH-1b	KOP C84	Photographic Simulation, Revised Proposed Route Segment 8
	BH-1c	KOP C85	Existing Conditions, Revised Proposed Route Segment 8
	BH-1d	KOP C85	Photographic Simulation, Revised Proposed Route Segment 8



Viewpoint Location Map

Legend

Key Observation Point

Transmission Line Routes

Proposed

Route

Visual Resource Management

Class I

Class II

Class III

Class IV

Surface Ownership

Bureau of Land Management

U.S. Forest Service

National Park Service

Bureau of Reclamation

Department of Defense

State

Private

State Boundary

County Boundary

Photograph Information

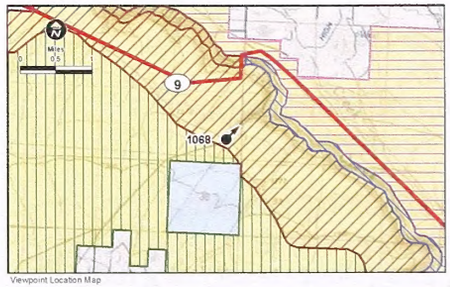
Time of photograph:	11:56 AM
Date of photograph:	9-14-09
Weather condition:	Partly Cloudy
Viewing direction:	Northeast
Latitude:	42°26'17.30"N
Longitude:	114°52'22.00"W
Distance:	0.8 Mile

Photograph is intended to be viewed 12 inches from viewer's eyes when printed on 11x17 paper. The photograph below has been cropped top and bottom to show a wide angle of view with the above photograph's area shown in yellow.

Existing Conditions
from Key Observation Point 1068
Segment 9 Revised
Proposed Route/Route 9K

Gateway West
500kV Transmission Project

Figure TF-1a



Viewpoint Location Map

Legend

Key Observation Point

Transmission Line Routes

Proposed

Route

Visual Resource Management

Class I

Class II

Class III

Class IV

Surface Ownership

Bureau of Land Management

U.S. Forest Service

National Park Service

Bureau of Reclamation

Department of Defense

State

Private

State Boundary

County Boundary

Photograph Information

Time of photograph:	11:56 AM
Date of photograph:	9-14-09
Weather condition:	Partly Cloudy
Viewing direction:	Northeast
Latitude:	42°26'17.30"N
Longitude:	114°52'22.00"W
Distance:	0.8 Mile

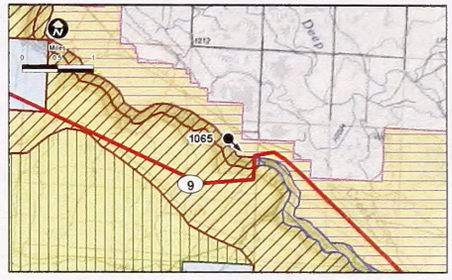
Photograph is intended to be viewed 12 inches from viewer's eyes when printed on 11x17 paper. The photograph below has been cropped top and bottom to show a wide angle of view with the above photograph's area shown in yellow.

Photographic Simulation
from Key Observation Point 1068
Segment 9 Revised
Proposed Route/Route 9K

Gateway West
500kV Transmission Project

Figure TF-1b

Above photograph is intended to be viewed 18 inches from viewer's eyes when printed on 11x17 paper. The photograph below has been cropped to show a wide angle of view with the above photograph's area shown in yellow.



Legend

Key Observation Point

Transmission Line Routes

Proposed

Route

Visual Resource Management

Class I

Class II

Class III

Class IV

Photograph Information

Time of photograph: 12:08 PM

Date of photograph: 9-14-09

Weather condition: Cloudy

Viewing direction: Southeast

Latitude: 42°27'30.816"N

Longitude: 114°52'36.79"W

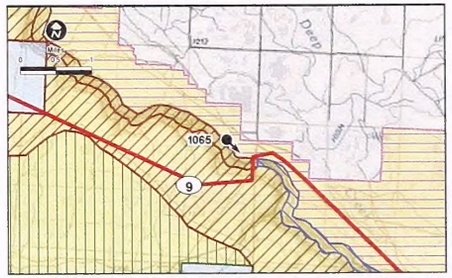
Distance: 0.5 mile

Existing Conditions
from Key Observation Point 1065
Segment 9 Revised
Proposed Route/Route 9K

Gateway West
500kV Transmission Project

Figure TF-1c

Above photograph is intended to be viewed 18 inches from viewer's eyes when printed on 11x17 paper. The photograph below has been cropped to show a wide angle of view with the above photograph's area shown in yellow.



Legend

Key Observation Point

Transmission Line Routes

Proposed

Route

Visual Resource Management

Class I

Class II

Class III

Class IV

Photograph Information

Time of photograph: 12:08 PM

Date of photograph: 9-14-09

Weather condition: Cloudy

Viewing direction: Southeast

Latitude: 42°27'30.816"N

Longitude: 114°52'36.79"W

Nearest tower in view: 0.45 Miles

Photographic Simulation
from Key Observation Point 1065
Segment 9 Revised
Proposed Route/Route 9K

Gateway West
500kV Transmission Project

Figure TF-1d

Viewpoint Location Map

Legend

Key Observation Point

Transmission Line Routes
- Proposed
- Route

Visual Resource Management
- Class I
- Class II
- Class III
- Class IV

Surface Ownership
- Bureau of Land Management
- U.S. Forest Service
- National Park Service
- Bureau of Reclamation
- Department of Defense
- State
- Private
- State Boundary
- County Boundary

Photograph Information

Time of photograph:	10:06 AM
Date of photograph:	8-21-10
Weather condition:	Partly Cloudy
Viewing direction:	South
Latitude:	43°2'8.80"N
Longitude:	115°20'1.74"W
Distance:	0.1 Mile

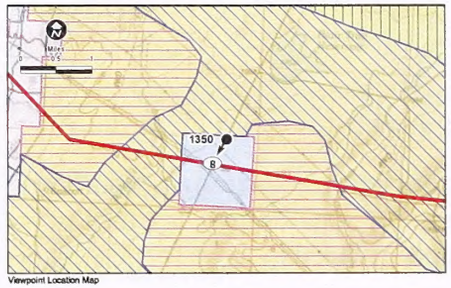
Photograph is intended to be viewed 12 inches from viewer's eyes when printed on 11x17 paper. The photograph below has been cropped top and bottom to show a wide angle of view with the above photograph's area shown in yellow.

P:\ENVPLANNING\Idaho\Power\22240030_Gateway_West\eis\layout\skop-1350.indd Export Date 07/18/11

Existing Conditions
from Key Observation Point 1350
Segment 8 Revised Proposed Route

Gateway West
500kV Transmission Project

Figure J-5a



Viewpoint Location Map

Legend

Key Observation Point

Transmission Line Routes
- Proposed
- Route

Visual Resource Management
- Class I
- Class II
- Class III
- Class IV

Surface Ownership
- Bureau of Land Management
- U.S. Forest Service
- National Park Service
- Bureau of Reclamation
- Department of Defense
- State
- Private
- State Boundary
- County Boundary

Photograph Information

Time of photograph:	10:06 AM
Date of photograph:	8-21-10
Weather condition:	Partly Cloudy
Viewing direction:	South
Latitude:	43°2'8.80"N
Longitude:	115°20'1.74"W
Distance:	0.1 Mile

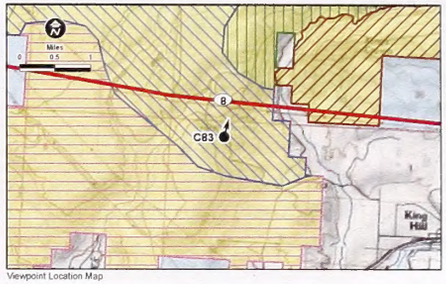
Photograph is intended to be viewed 12 inches from viewer's eyes when printed on 11x17 paper. The photograph below has been cropped top and bottom to show a wide angle of view with the above photograph's area shown in yellow.

P:\ENVPLANNING\IdahoPower\22240030_Gateway_West\ds\ms\layouts\kop-1350.indd Export Date 07/18/11

Photographic Simulation
from Key Observation Point 1350
Segment 8 Revised Proposed Route

Gateway West
500kV Transmission Project

Figure J-5b



Viewpoint Location Map

Legend

Key Observation Point

Transmission Line Routes
- Proposed
- Route

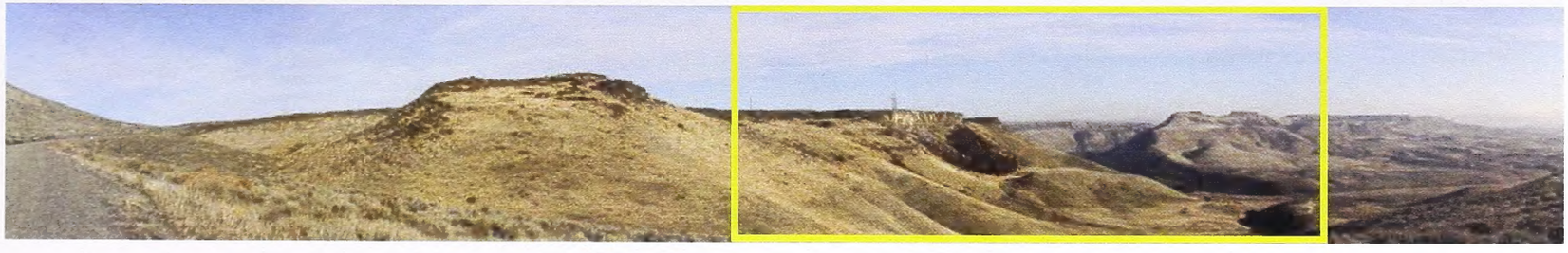
Visual Resource Management
- Class I
- Class II
- Class III
- Class IV

Surface Ownership
- Bureau of Land Management
- U.S. Forest Service
- National Park Service
- Bureau of Reclamation
- Department of Defense
- State
- Private
- State Boundary
- County Boundary

Photograph Information

Time of photograph:	9:00 AM
Date of photograph:	12-8-09
Weather condition:	Party Cloudy
Viewing direction:	North
Latitude:	42°48'41.47"N
Longitude:	105°49'41.72"W
Distance:	0.5 Mile

Photograph is intended to be viewed 12 inches from viewer's eyes when printed on 11x17 paper. The photograph below has been cropped top and bottom to show a wide angle of view with the above photograph's area shown in yellow.



Existing Conditions
from Key Observation Point C83
Segment 8 Revised Proposed Route

Gateway West
500kV Transmission Project

Figure J-5c

Photograph is intended to be viewed 12 inches from viewer's eyes when printed on 11x17 paper. The photograph below has been cropped top and bottom to show a wide angle of view with the above photograph's area shown in yellow.

Viewpoint Location Map

Legend

Key Observation Point

Transmission Line Routes

Proposed

Route

Visual Resource Management

Class I

Class II

Class III

Class IV

Surface Ownership

Bureau of Land Management

U.S. Forest Service

National Park Service

Bureau of Reclamation

Department of Defense

State

Private

State Boundary

County Boundary

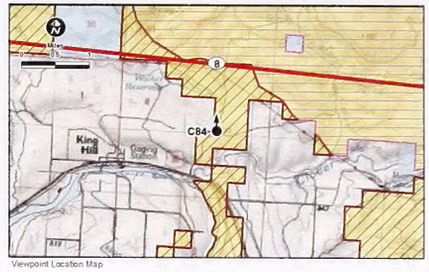
Photograph Information

Time of photograph:	9:00 AM
Date of photograph:	12-8-09
Weather condition:	Party Cloudy
Viewing direction:	North
Latitude:	42°48'41.47"N
Longitude:	105°49'41.72"W
Distance:	0.5 Mile

Photographic Simulation
from Key Observation Point C83
Segment 8 Revised Proposed Route

Gateway West
500kV Transmission Project

Figure J-5d



Viewpoint Location Map

Legend

Key Observation Point

Transmission Line Routes

Proposed

Route

Visual Resource Management

Class I

Class II

Class III

Class IV

Surface Ownership

Bureau of Land Management

U.S. Forest Service

National Park Service

Bureau of Reclamation

Department of Defense

State

Private

State Boundary

County Boundary

Photograph Information

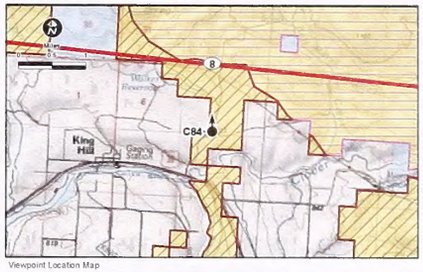
Time of photograph:	10:38 AM
Date of photograph:	11-8-09
Weather condition:	Partly Cloudy
Viewing direction:	North
Latitude:	43°0'37.67"N
Longitude:	115°10'29.43"W
Distance:	1 Mile

Photograph is intended to be viewed 12 inches from viewer's eyes when printed on 11x17 paper. The photograph below has been cropped top and bottom to show a wide angle of view with the above photograph's area shown in yellow.

Existing Conditions
from Key Observation Point C84
Segment 8 Revised Proposed Route

Gateway West
500kV Transmission Project

Figure BH-1a



Viewpoint Location Map

Legend

Key Observation Point

Transmission Line Routes

Proposed

Route

Visual Resource Management

Class I

Class II

Class III

Class IV

Surface Ownership

Bureau of Land Management

U.S. Forest Service

National Park Service

Bureau of Reclamation

Department of Defense

State

Private

State Boundary

County Boundary

Photograph Information

Time of photograph:	10:38 AM
Date of photograph:	11-8-09
Weather condition:	Partly Cloudy
Viewing direction:	North
Latitude:	43°0'37.67"N
Longitude:	115°10'29.43"W
Distance:	1 Mile

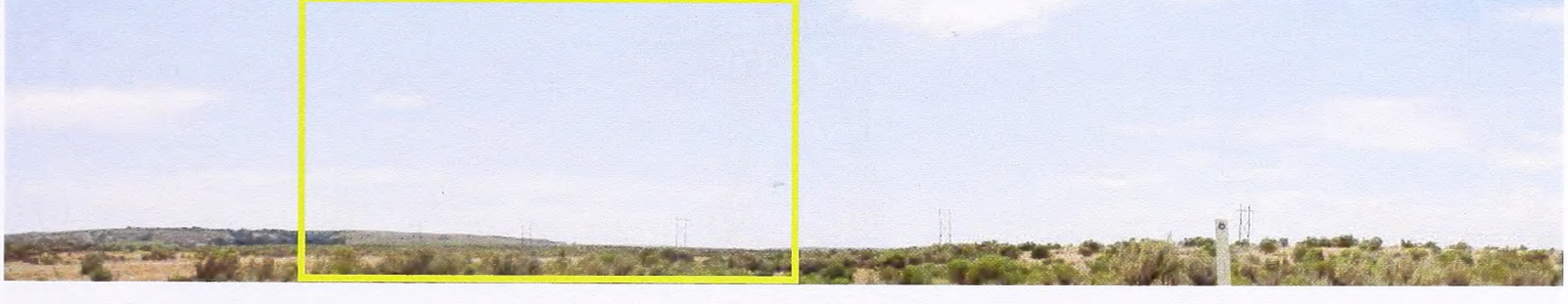
Photograph is intended to be viewed 12 inches from viewer's eyes when printed on 11x17 paper. The photograph below has been cropped top and bottom to show a wide angle of view with the above photograph's area shown in yellow.

Photographic Simulation from Key Observation Point C84 Segment 8 Revised Proposed Route

Gateway West
500kV Transmission Project

Figure BH-1b

Photograph is intended to be viewed 12 inches from viewer's eyes when printed on 11x17 paper. The photograph below has been cropped top and bottom to show a wide angle of view with the above photograph's area shown in yellow.



Viewpoint Location Map

Legend

Key Observation Point

Transmission Line Routes

Proposed

Route

Visual Resource Management

Class I

Class II

Class III

Class IV

Surface Ownership

Bureau of Land Management

U.S. Forest Service

National Park Service

Bureau of Reclamation

Department of Defense

State

Private

State Boundary

County Boundary

Photograph Information

Time of photograph:	11:46 AM
Date of photograph:	8-6-08
Weather condition:	Partly Cloudy
Viewing direction:	Southeast
Latitude:	42°59'9.61"N
Longitude:	115° 4'5.51"W
Distance:	0.1 Mile

Existing Conditions
from Key Observation Point C85
Segment 8 Revised Proposed Route

Gateway West
500kV Transmission Project

Figure BH-1c

Viewpoint Location Map

Legend

Key Observation Point

Transmission Line Routes

Proposed

Route

Visual Resource Management

Class I

Class II

Class III

Class IV

Surface Ownership

Bureau of Land Management

U.S. Forest Service

National Park Service

Bureau of Reclamation

Department of Defense

State

Private

State Boundary

County Boundary

Photograph Information

Time of photograph:	11:46 AM
Date of photograph:	8-6-08
Weather condition:	Partly Cloudy
Viewing direction:	Southeast
Latitude:	42°59'9.61"N
Longitude:	115° 4'5.51"W
Distance:	0.1 Mile

Photograph is intended to be viewed 12 inches from viewer's eyes when printed on 11x17 paper. The photograph below has been cropped top and bottom to show a wide angle of view with the above photograph's area shown in yellow.

Photographic Simulation
from Key Observation Point C85
Segment 8 Revised Proposed Route

Gateway West
500kV Transmission Project

Figure BH-1d

Attachment B

Key Observation Point Views

Table of Contents

Figure B-1. Existing Conditions from KOP 1067 in the General Area of the Segment 9 Revised Proposed Route/Route 9K (TF-1 AOI) B-1
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Appendix H
Resource Advisory Council (RAC) Report

Boise District Resource Advisory Council Subcommittee Review and Comments on the Gateway West Transmission Line Project Mitigation and Enhancement Portfolio for the Morley Nelson Snake River Birds of Prey National Conservation Area

May 30, 2014

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ATTACHMENTS

Attachment A. Comments on the Gateway West Enhancement and Mitigation package from Michael N. Kochert.
Attachment B. Gateway West Mitigation and Enhancement Portfolio – DRAFT GEAS Comments – February 27, 2014.
Attachment C. Summary of Findings and Recommendations for Raptor Monitoring Generated from the Workshop on Monitoring Raptor Status and Trends in the NCA.

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INTRODUCTION

The Boise District Resource Advisory Council (RAC) advises and makes recommendations to the Bureau of Land Management (BLM) on resource and land management issues in southwestern Idaho. The RAC formed a subcommittee in November 2013 to work on issues surrounding siting the Gateway West Transmission Line Project (GWW) in portions of the Boise District in and around the Morley Nelson Snake River Birds of Prey National Conservation Area (BOPNCA), as well as on private lands. The subcommittee began evaluating the issues related to the GWW, as described in the *Boise District Resource Advisory Council Subcommittee Report on Gateway West Segments In or Near the Morley Nelson Snake River Birds of Prey National Conservation Area* which accompanies this report. The accompanying report summarizes our route option review and recommendations relative to the GWW within and near the BOPNCA.

One task that the subcommittee has undertaken is an evaluation of the Draft Mitigation and Enhancement Portfolio Proposal (Draft Portfolio) prepared by Rocky Mountain Power and Idaho Power Company (hereafter the Companies). The Companies originally submitted the Draft Portfolio to BLM during the comment period for the GWW final environmental impact statement (FEIS) and then revised the document and submitted it to the RAC subcommittee for further evaluation in January 2014. This report presents a summary of the Draft Portfolio and the subcommittee's comments and recommendations for consideration by the RAC, BLM and the Companies in finalizing this important component of GWW.

The Draft Portfolio submitted by the Companies is designed to go above and beyond the standard mitigation requirements (which includes avoidance and minimization through implementation of design features and environmental protection measures/best management practices), which are addressed separately in the permitting process. The Draft Portfolio includes both compensatory mitigation and enhancement components. The compensatory mitigation program addresses the "residual effects" which persist after standard mitigation has been implemented. This additional mitigation is required to return an impacted area to baseline conditions[1]. The enhancement program is designed to go beyond the compensatory mitigation and create a net benefit to the BOPNCA relative to current conditions. The enhancement program has been tailored to the special features of the BOPNCA and the desired future conditions, as determined by the BLM.

The mitigation and enhancement program in the Draft Portfolio should be designed to last the duration of the project permit and monitored throughout:

[1] For the purposes of this report, baseline conditions are based on the ecological site potential for a specific area.

> The BLM should ensure adequate management, protection, and monitoring of the mitigation during the expected lifetime of the development project and its associated impacts.-Draft MS-1794 – Regional Mitigation Manual Section (P) http://www.blm.gov/pgdata/etc/medialib/blm/wo/Information_Resources_Management/policy/im_attachments/2013.Par.57631.File.dat/IM2013-142_att1.pdf

A mitigation and enhancement plan should be consistent with the enabling legislation for BOPNCA, Public Law 103-64, which established the BOPNCA in 1993 for the following purposes:

> The purposes for which the conservation area is established, and shall be managed, are to provide for the conservation, protection, and enhancement of raptor populations and habitats and the natural and environmental resources and values associated therewith, and of the scientific, cultural, and educational resources and values of the public lands in the conservation area.
>
> Section 2(4) of the Act defines the term "raptor habitat" to include the habitat of the raptor prey base as well as the nesting and hunting habitat of raptors within the conservation area.
>
> Section 1((5)(D) states, "Protection of the conservation area as a home for raptors can best and should be accomplished by the Secretary of the Interior, acting through the Bureau of Land Management, under a management plan that: (…) (D) allows for diverse appropriate uses of lands in the area to the extent consistent with the maintenance and enhancement of raptor populations and habitats and protection and sound management of other resources and values of the area."
>
> Section 2002 of Public Law 111–11—Mar. 30, 2009, established the National Landscape Conservation System (NLCS) within the BLM and automatically made Snake River Birds of Prey National Conservation Area, among other National Conservation Areas and other special areas, part of the NLCS. Public Law 111-11 specifically mandated the NLCS to uphold the enabling legislation for each of the components of the NLCS. Section 2301 added "Morley Nelson" to the NCA's title to recognize the contribution of that individual.

Morley Nelson was the first to recognize the significance of what is now the BOPNCA, and his life work was dedicated to demonstrating that raptor protection could be compatible with electrical power transmission and distribution.

The BOPNCA is included in the National Landscape Conservation System, which was created in 2000 with a mission to "conserve, protect, and restore these nationally significant landscapes that have outstanding cultural, ecological, and scientific values for the benefit of current and future generations." This system was formally established by Congress through the Omnibus Public Land Management Act of 2009 and includes 878 federally recognized areas and approximately 27 million acres of National Conservation Areas, Wilderness Areas, Wilderness Study Areas, Wild and Scenic Rivers, National Monuments, National Scenic and Historic Trails, and other special areas. The BLM's National Conservation Lands include 16 NCAs and five similar units in ten states.

To authorize a right-of-way under the Federal Land Policy and Management Act (FLPMA) through any portion of the BOPNCA, the BLM is charged with demonstrating that: 1) the use is compatible with the enabling legislation of the BOPNCA (PL 103-64, BLM 2012a); 2) the agency has avoided impacting the BOPNCA to the greatest extent possible (MS 6220); 3) impacts to Greater sage-grouse (BLM 2012b), private property, and local communities, among others, are considered; and 4) an enhancement program will result in a net benefit to the NCA for the duration of the permit (PL 103-64). This report focuses on item 4.

HISTORY OF INFORMATION SUBMITTED

The following is a chronology of information submitted or presented to the subcommittee related to the requirement for a mitigation and enhancement plan for the BOPNCA:

- On December 17, 2013, the Companies gave a presentation on the proposed Draft Portfolio at the RAC subcommittee meeting. The subcommittee held a discussion following the presentation. Comments were later developed by subcommittee members and one member of the public, Michael N. Kochert. The document submitted by Mr. Kochert was titled "Comments on the Gateway West Enhancement and Mitigation package". This document is dated January 5, 2014 and is included as Attachment A.

- On January 13, 2014, the Morley Nelson Snake River Birds of Prey National Conservation Area Gateway West DRAFT Mitigation and Enhancement Portfolio Proposal was transmitted via email to the subcommittee with applicable Environmental Protection Plans (Appendix A) and Cost Estimator tables for BOPNCA Enhancement (Appendix B). The document was prepared by the Companies and dated January 2014.

- On January 16, 2014, the Companies provided an update on the Draft Portfolio to the subcommittee focusing on proposed route Segments 8 and 9 and the components of the plan including habitat restoration, law enforcement, visitor enhancement, land purchase, and existing facility removal. The Draft Portfolio also proposed an oversight committee made up of members with an intimate knowledge of the area. A discussion followed the

update, and comments were provided to the Companies by the subcommittee and the public. These comments are included later in this document.

- On January 28, 2014, the subcommittee provided a brief overview of the Draft Portfolio during the RAC meeting.
- On February 26, 2014, a representative of the Idaho Army National Guard (IDARNG) presented an overview of the Mitigation and Enhancement Program for the Orchard Combat Training Center (OCTC) which is also within the BOPNCA.
- On March 3, 2014, the BLM circulated a list of questions submitted by subcommittee members regarding the Draft Portfolio in preparation for the March 10, 2014 subcommittee meeting.
- On March 10, 2014, the Companies presented an update of the Draft Portfolio and responded to the questions posed by the subcommittee. In addition, a panel discussion was held that included representatives from the BLM, U.S. Geological Survey (USGS), the Audubon Society, and Intermountain Rangeland Consultants regarding the challenges and opportunities in restoring habitat in the BOPNCA. The panel discussion was followed by a presentation by a retired USGS raptor expert on raptor monitoring issues. The Companies also responded to the questions previously circulated by the BLM (see previous item).
- On March 11, 2014, the subcommittee received draft comments from the Golden Eagle Audubon Society in a document titled "Gateway West Mitigation and Enhancement Portfolio – DRAFT Greater Eagle Audubon Society (GEAS) Comments – February 27, 2014". These comments are included as Attachment B.
- On April 2, 2014, the Companies gave a presentation of a summary of the Draft Portfolio. One objective of the presentation was to provide a distinction between mitigation and enhancement portions of the Draft Portfolio and separately discuss the components of each. The Companies also showed how the funding in the Draft Portfolio could be scaled depending on the routes selected and provided a handout showing how to use the Gateway West Snake River Birds of Prey Enhancement and Mitigation Calculator.
- On April 23, 2014, the Companies provided an estimate of the enhancement funding for the routes recommended by the subcommittee, as well as for all other route options that have been considered by the subcommittee for reference.

SUMMARY OF THE COMPONENTS AND THE PROPOSED FUNDING IN THE DRAFT PORTFOLIO

The Companies first submitted the Draft Portfolio in June 2013 during the FEIS comment period. The Portfolio described "a proposed approach to determine the level of mitigation and enhancement needed to allow for the approval of both Segments 8 and 9." Proposed funding levels in the Draft Portfolio were based on modified versions of the Companies' proposed routes in the FEIS. Proposed Segment 8 was modified by Alternatives 8D and 8E, and Proposed Segment 9 was modified by Alternative 9G. These routes are identified in the subcommittee's report on route options as "Draft Portfolio Proposed Routes." The anticipated level of disturbance and line mileage within the BOPNCA for the Draft Portfolio Proposed Routes can be considered "a metric than can be applied regardless of the alternative route considered". In other words, the proposed compensatory mitigation and enhancement for the Draft Portfolio Proposed Routes can be considered a baseline proposal. In the event that different route options are selected by BLM, portions of the compensatory mitigation and enhancement for the BLM selected routes would be determined by a ratio or scaling factor applied to the Draft Portfolio Proposed Routes. In describing the impact of the project on the BOPNCA, the Companies used results of the FEIS analysis, which addressed impacts to cultural resources, plant and wildlife resources (general vegetation, invasive plant species, wetlands, and special status plant species), and raptors and their habitat.

The Draft Portfolio consists of 1) measures and plans for avoidance, minimization, restoration, and compensatory mitigation to offset residual impacts; and 2) elements to enhance the objects and values of the BOPNCA. This review is limited to a review of the components of compensatory mitigation and enhancement. Compensatory mitigation in the Draft Portfolio includes:

- **Habitat Restoration**. Funding for habitat restoration is proposed by the Companies within the BOPNCA in addition to reclamation of temporary disturbances. The acreage used in the calculation is scaled by impact and is based on the operational footprint of the project such as a tower footprint and any new permanent access roads. Habitat restoration efforts will be directed towards a return to native vegetation.

- **Law Enforcement**. Funding for part-time law enforcement is proposed to focus on and minimize/eliminate illegal behavior, particularly in response to new permanent access roads.

The Companies indicate that impacts to cultural resources will be mitigated by implementation of the Segment Historic Properties Treatment Plans and a Historic Trails Mitigation Plan. Also, in the event that there would be any impacts to wetlands or riparian areas, those impacts would be offset and mitigated by the implementation of the wetland mitigation plan titled

"Compensatory Mitigation for and Monitoring of Unavoidable Impacts to Waters of the United States". Table 1 provides the estimated cost of the compensatory mitigation components in the Draft Portfolio.

Table 1. Estimated Cost of Compensatory Mitigation.

Element	Habitat Restoration	Law Enforcement ¼ FTE for 10 years	Total
Compensatory Mitigation	$266,400	$350,000	$616,400

Enhancement in the Draft Portfolio includes:

- **Habitat Restoration**. Funding for habitat restoration is proposed by the Companies within the BOPNCA in addition to compensatory mitigation and the reclamation of temporary disturbances. The acreage used in the calculation is based on the construction footprint of the project, which is larger than the operational footprint. The funding is scalable depending on the number of acres and the quality of land affected by the project. High quality lands, such as undisturbed habitat, would be mitigated with a higher number of acres, while lower quality land, such as land occupied by invasive species, would be mitigated with a lower number of acres. Habitat restoration would be aggressive and concentrated with the intent of a high success rate for each acre restored. Habitat restoration efforts will be directed towards a return to perennial vegetation.

- **Land Purchase.** Funding for land purchase is proposed by the Companies to protect cultural resources and habitat. The Companies would provide funding to be used for the purchase of property(ies) with unique cultural, visual, and/or ecological values to further protect those resources from future damage. Properties would be purchased from willing sellers within the BOPNCA boundaries, and the amount of money offered for property purchase would be scaled using the miles of the BOPNCA crossed by the proposed route.

- **Law Enforcement.** Funding for law enforcement is proposed by the Companies to reduce inappropriate behavior within the BOPNCA. The Draft Portfolio provides for a BLM ranger to offset potential unlawful activity that may be associated with the increased access created by new rights-of-way and maintenance roads. The funding is scaled by line miles of the routes within the BOPNCA and would last for an initial 10-year period followed by an additional 10 years but with funding for fewer hours per week.

- **Visitor Enhancement.** Funding for visitor enhancement is proposed by the Companies to educate visitors of the values of BOPNCA and in the appropriate behavior within and use of the BOPNCA. This funding is also scaled by line miles of the routes within the BOPNCA.

- **Management Fund.** A management fund is proposed by the Companies to cover the costs of the oversight committee, administration, and monitoring. The management fund, regardless of routes ultimately approved by the BLM, is a fixed amount equal to the amount currently proposed. The oversight committee would be made up of people with knowledge of the BOPNCA and surrounding area.

- **Idaho Power Existing Facility Removal**. The Companies propose to remove portions of two existing lower-voltage power lines and one substation owned by Idaho Power from areas within the BOPNCA to further enhance the BOPNCA. The BLM could elect to leave some of the power poles from the removed lines as perching and nesting opportunities for birds of prey. The Companies still have customers to serve in these areas and have included in the removal of the lower-voltage power lines the additional infrastructure required (which is outside the BOPNCA) to continue service to these customers.

Table 2 provides the estimated cost of the enhancement components based on the Draft Portfolio Proposed Routes. The total cost of compensatory mitigation and enhancement is shown on Table 3.

Table 2. Estimated Cost of the Enhancement Components of the Draft Portfolio.

Element	Habitat Restoration	Law Enforcement ¾ FTE for 10 years, ½ FTE for an additional 10 years	Land Purchase	Visitor Enhancement	IPC Line Removal	Management Funding	Total
Enhancement	$3,297,600	$1,750,000	$320,000	$500,000	$1,922,000 (cost to Companies)	$1,000,000	$6,867,600 (excluding line removal costs)

Table 3. The Estimated Total Cost of Proposed Compensatory Mitigation and Enhancement Components.

Element	Habitat Restoration	Law Enforcement ¾ FTE for 10 years, ½ FTE for an additional 10 years	Land Purchase	Visitor Enhancement	IPC Line Removal	Management Funding	Total
Mitigation	$266,400	$350,000	--	--	--	--	$616,400
Enhancement	$3,297,600	$1,750,000	$320,000	$500,000	$1,922,000 (cost to Companies)	$1,000,000	$6,867,600 (excluding line removal costs)
TOTALS	$3,564,000	$2,100,000	$320,000	$500,000	$1,922,000 (cost to Companies)	$1,000,000	$7,484,000 (excluding line removal costs)

The total cost of the Draft Portfolio based on the Companies proposed routes, including costs incurred by the Companies to remove Idaho Power facilities is $9,406,000.

During the April 18, 2014 meeting, the subcommittee completed the identification and categorization of alternative routes for Segments 8 and 9 in and around the BOPNCA. The subcommittee classified route options as either recommended or not recommended. The subcommittee then requested that the Companies provide an estimated enhancement funding value for the recommended routes. The Companies provided the estimated enhancement funding for all subcommittee route options (routes ranked recommended and not recommended), and the values and other information are provided in Table 4.

In addition to Table 4, the Companies also provided the following summary information and example calculation of the estimated enhancement funding values using the subcommittee recommended routes:

- Companies' Draft Portfolio Proposed routes
  - Segment 8 with 8D and 8E – *36.6 miles*
  - Segment 9 with 9G – *52.3 miles*
- Subcommittee recommended alternative routes – miles on BLM within the BOPNCA
  - Segment 8, Summer Lake Option 1 revised – *15.4 miles*
  - Segment 9, Baja Road-Murphy Flat South revised – *46.1 miles*
- Percentage of subcommittee recommended alternative line miles to Companies' Proposed routes
  - Segment 8, Summer Lake Option 1 revised – 15.4/36.6 = *42.08%*
  - Segment 9, Baja Road-Murphy Flat South revised – 46.1/52.3 = *88.15%*

- Estimated enhancement funding value of subcommittee recommended route options based on Companies' proposed enhancement funding amount for habitat restoration, land purchase, law enforcement, and visitor enhancement for each segment
    - Segment 8, Summer Lake Option 1 revised – $2,527,765*42.08% = *$1,063,684*
    - Segment 9, Baja Road-Murphy Flat South revised – $3,339,835*88.15% = *$2,944,065*
- Total estimated enhancement funding value for subcommittee recommended route options
    - $1,063,593 + $2,943,908 + $1,000,000 (management fund) = **$5,007,501**
- Total value of estimated enhancement for subcommittee recommended route options
    - $5,007,503 + $1,922,000 (Idaho Power facility removal) = **$6,929,503**

Table 4. Subcommittee Route Options Estimated Enhancement Funding.

Route	BLM*	Subcommittee Route Options Category	Subcommittee Route Options - % of Companies' Proposed Routes	Subcommittee Route Options - Estimated Enhancement Funding**
Segment 8				
Draft Portfolio Proposed Route 8	36.6	Not recommended	100%	$2,527,765
Applicant Proposed (FEIS)	25.4	Not recommended	69.40%	$1,754,241
Bowmont North	4.8	Not recommended	13.11%	$331,510
Bowmont South	12.1	Not recommended	33.06%	$835,682
Bowmont South - 500kV Rebuild	0.7	Not recommended	1.91%	$48,345
King Hill-Mayfield	1.7	Not recommended	4.64%	$117,410
Melmont Option 1	9.3	Not recommended	25.41%	$642,301
Melmont Option 2	9.4	Not recommended	25.68%	$649,207
OCTC Alpha Sector By-pass Variation (FEIS Alt 8D)	2.9	Not recommended	7.92%	$200,287
Sinker Butte (FEIS Alt 8E)	38.6	Not recommended	105.46%	$2,665,894
Summer Lake (Option 2)	18.8	Not recommended	51.37%	$1,298,415
Summer Lake Option 1	15.4	Recommended	42.08%	$1,063,595
Segment 9				
Draft Portfolio Proposed Route 9	52.3	Not recommended	100%	$3,339,835
Applicant Proposed (WWEC Alternative - FEIS)	4.8	Not recommended	9.18%	$306,524
Baja Road-Murphy Flat North Option 1	48.7	Not recommended	93.12%	$3,109,942
Baja Road-Murphy Flat North Option 2	47.1	Not recommended	90.06%	$3,007,767
Baja Road-Murphy Flat North Option 3	48.7	Not recommended	93.12%	$3,109,942

Table 4. Subcommittee Route Options Estimated Enhancement Funding.

Route	BLM*	Subcommittee Route Options Category	Subcommittee Route Options - % of Companies' Proposed Routes	Subcommittee Route Options - Estimated Enhancement Funding**
Baja Road-Murphy Flat S.	46.1	Recommended	88.15%	$2,943,908
Baja Road-Sinker Creek	43.7	Not recommended	83.56%	$2,790,646
Baja Road-Summer Lake	46.7	Not recommended	89.29%	$2,982,223
Bruneau South Variation (FEIS Alt 9H)	1.4	Not recommended	2.68%	$89,403
Cove Variation (FEIS Alt 9D)	5.8	Not recommended	11.09%	$370,383
Glenn's Ferry-Mayfield	2	Not recommended	3.82%	$127,718
Owyhee Uplands (DEIS Alt 9E)	2.7	Not recommended	5.16%	$172,420
Owyhee Uplands (FEIS Alt 9E)	5	Not recommended	9.56%	$319,296
Sinker Creek Variation	0.2	Not recommended	0.38%	$12,772

** Miles of transmission line on BLM managed land within the BOPNCA.

** Includes funding for habitat restoration, land purchase, law enforcement, and visitor enhancement. Does not include management funding ($1M) and does not include cost to Companies for facility removal ($1.922M).

RAC SUBCOMMITTEE AND PUBLIC COMMENTS AND RECOMMENDATIONS ON THE DRAFT PORTFOLIO

General Comments

The subcommittee commends the Companies for including several components that address important BOPNCA values in their Draft Portfolio. We agree with the apparent long-term commitment implied by the financial support designated for law enforcement, the management oversight group, and cultural resources protection. Although we may disagree with the dollar amounts proposed in both real and relative terms, we agree that a long-term commitment is necessary to mitigate the direct impacts of the GWW project through the BOPNCA and to enhance the area for future generations.

The subcommittee also commends the Companies for their continued involvement and cooperative interaction during the course of the 6-month process of the subcommittee meetings and deliberations. We have learned from the Companies and sincerely appreciate their cooperation and adaptability during the process.

The BOPNCA was established to protect raptor populations and habitats and the natural, environmental, scientific, cultural and educational resources found within the conservation area. The enhancement package applies to these resources. In addition, the enhancement package must take into account the current resources available to protect the NCA. Native vegetation in the NCA has suffered greatly due to fires, off-road vehicle use and a lack of restoration resources. On the other hand, there are dozens of groups in the Boise area conducting outings and tours to educate the public about the NCA. The enhancement package should focus on the resources within the NCA that are most in need of enhancement- raptor populations, habitats and the natural environment. This includes restoring native habitat, closing and monitoring roads that fragment the landscape, and decreasing the destructive impacts of fires.

Lastly, while the subcommittee thanks the Companies for their expertise during this process, we cannot endorse the enhancement package as presented. The Companies' enhancement package proposes a myriad of various projects without demonstrating how standards of enhancement will be met during the life of the project. We encourage the BLM to take a hard look at the true cost of enhancement. The enhancement package should not be punitive, but must meet the high standards outlined in the NCA legislation.

The Subcommittee did not reach a conclusion on the funding levels contained in the Draft Portfolio. However, the general consensus of the subcommittee is that the proposed funding levels are too low. As BLM moves forward with any additional NEPA reviews the Subcommittee recommends that BLM explore how successful mitigation and enhancement packages have been developed in other areas of the country. Settling upon a dollar amount for mitigation and enhancement will entail numerous negotiation sessions between the Companies

and BLM. Hopefully, it will include some background assessments of the environmental, social and economic benefits and costs of lines crossing the BOPNCA. We encourage the BLM and the Companies to derive a valid economic assessment of the benefits and costs of the actions specific to the BOPNCA for the NEPA process.

The subcommittee found that the Draft Portfolio did not adequately address enhancement of raptor populations and scientific resources and values, and we recommend that it be expanded to include components to enhance these two important values recognized by the enabling legislation. In addition, we recommend that Law Enforcement and Visitor Enhancement be combined into one category, called Visitor Management which would also include Education. There should be separate categories for Enhancement of Raptor Populations and Research and Monitoring. The subcommittee recommends that the BLM and the Companies re-evaluate priorities and revise the proposed allocations among these components.

To be consistent with the enabling legislation, the RAC subcommittee recommends that the Draft Portfolio should seek to conserve, protect, and enhance these specific resource issues:

- Raptor populations;
- Raptor habitats (raptor habitat includes the habitat of the raptor prey base as well as the nesting and hunting habitat of raptors within the BOPNCA);
- Natural and environmental resources and values associated with the BOPNCA;
- Scientific resources and values of the public lands in the BOPNCA;
- Cultural resources and values of the public lands in the BOPNCA; and
- Educational resources and values of the public lands in the BOPNCA.

We believe that the Draft Portfolio should be designed and implemented with the following considerations:

- Be consistent with the BOPNCA Enabling Legislation and highlight the relevant features, particularly raptors, their prey and the supporting habitat;
- Be diverse: contain a diverse portfolio of enhancement options, some of which the Draft Portfolio contains;
- Be durable: the functional time span of each component of the Draft Portfolio needs to be discussed, and the benefits need to last for as long as the impacts of the transmission line are expected to be present;
- Accurately assess the probability of restoration success: the measure of success should not be the number of attempts at restoration, but achieved restoration to a set of pre-agreed upon criteria;
- Protect high-quality habitat and restoration areas: successful restoration efforts need to be protected; and

- Be reasonable (both locally and nationally): the enhancement opportunities provided by the Draft Portfolio should not relieve the BLM of their responsibility to provide funding to manage the BOPNCA. That said, the enhancement components of the Draft Portfolio should be substantive.

SPECIFIC COMMENTS AND RECOMMENDATIONS

Habitat Restoration

The subcommittee believes that the Draft Portfolio should contain an integrated and adaptive approach with a long-term focus for habitat restoration in the BOPNCA using current scientific research and information as presented to the subcommittee on March 10, 2014 by representatives from the BLM, USGS, the Audubon Society, and Intermountain Rangeland Consultants. We believe that innovative methods for rangeland restoration should be evaluated and pursued within the BOPNCA that could eventually be used broadly to help manage lands outside the BOPNCA.

As we have discussed during the deliberations of the subcommittee, the concept of "baseline" conditions needs careful consideration and a clearer definition. Efforts at restoration and rehabilitation should be undertaken with the awareness that the BOPNCA includes some of the harshest environments in the Great Basin. The BOPNCA is in an environment that experiences extremely low precipitation, high summer temperatures, and invasion of habitat-altering annual grasses, all of which increases fire frequency. It will be extremely difficult to accomplish the restoration goals of the BLM and Companies without strategic planning and implementation that may include repeated efforts to establish vegetation in this harsh environment. We recommend that areas proposed for habitat restoration and enhancement be defined in detail via maps. However, we have concerns that small-scale, intensive and very expensive rehabilitation efforts will ultimately fail due to repeated fires, lack of maintenance, and other factors. We would prefer seeing larger, strategic areas treated than the small microcosms described in the Draft Portfolio.

We recommend that the portfolio's emphasis on small microcosms be reduced and combined with a landscape-scale strategy for habitat protection, restoration, and enhancement. Key remnant native sagebrush (*Artemisia*) patches within the BOPNCA that exhibit ecological integrity and are still "intact" should be identified, and preserving their integrity should be a priority. The subcommittee recommends that remnant stands of sagebrush and other perennial vegetation such as winterfat (*Krascheninnikovia lanata*) be protected using strategically placed firebreaks and other tools. Firebreaks may later be modified to protect newly restored and connected patches to help ensure protection from future fires. Successful protection of remaining habitat and restoration investments will require decreasing the response time of fire suppression efforts and increasing the response capability. These goals could be accomplished through a variety of partnerships and cooperative programs, including, but not limited to, the following:

- Providing additional fire-fighting resources (equipment, training, staff and funding, etc.);
- Updating cooperative agreements and coordinated response programs with rural fire departments, municipal Fire Departments, and Rangeland Fire Protection Associations to reduce the response time; and
- Updating the Idaho Fire Prevention Plan[2] to better protect native vegetation within the BOPNCA by preventing human-caused wildfires.

Enhancement of Raptor Populations

The first step in maintaining and enhancing raptor populations is to ensure that the new transmission lines have no adverse effects on raptors. Ultimately, enhancement measures should improve or at least maintain current raptor population levels. The permitting process should disallow line construction within the BOPNCA during the nesting season (February-August) to avoid direct disturbance to nesting raptors. Biologists and engineers should work together to design towers that are friendly to raptors but not to ravens. For example, the density of steel latticework on the bridge above the conductors should be as low as possible to discourage raven nesting. Towers with tubular metal poles may not benefit raptors because of vibrations and the lack of suitable perching and nesting sites.

The Draft Portfolio should include funding for construction of artificial platforms on transmission towers within the BOPNCA that will provide nesting sites at a safe location below the conductors. New towers in areas that replace or parallel existing lines should be designed in a way to encourage continued nesting by raptors, particularly ferruginous hawks (*Buteo regalis*), which are currently nesting on existing transmission towers. Where existing lines are planned for removal, structures that are suitable for raptor nests and perches should be left intact. Artificial nesting platforms can provide new and alternative nesting substrate for raptors, particularly ferruginous hawks and golden eagles (*Aquila chrysaetos*), in areas without cliffs or existing transmission lines (e.g., Murphy Flat). Providing opportunities for nesting on taller structures might benefit eagles on the Owyhee Front by reducing their exposure to disturbance from off highway vehicles.

Enhancing raptor populations requires enhancing prey populations, and prey populations are best enhanced by managing their habitat. The two principal prey species within the BOPNCA are the Piute ground squirrel (*Urocitellus mollis)* and the black-tailed jack rabbit *(Lepus californicus).* Ground squirrels are the primary prey of prairie falcons (*Falco mexicanus*), the raptor species for which the BOPNCA was first recognized and created. Jack rabbits are the primary prey of golden eagles. Jackrabbits require shrubs for food and cover; ground squirrels thrive best in vegetation communities dominated by native perennial shrubs and grasses.

[2]http://www.blm.gov/pgdata/etc/medialib/blm/id/fire/fire_restriction_maps.Par.70675.File.dat/2013_IdahoFireRestrictionsPlan_508.pdf

Restoring habitat and increasing prey populations will benefit raptors, but additional measures to enhance raptor populations directly should be included in population enhancement strategies. We recommend that a proactive and accelerated program for retrofitting distribution lines within the BOPNCA be undertaken to reduce the potential for electrocution of raptors. Poles should be retrofitted using designs developed by Morley Nelson for Idaho Power and following guidelines described in the Avian Power Line Interaction Committee's publication "Suggested Practices for Avian Protection On Power Lines: The State of the Art in 2006" (APLIC 2006). More frequent patrols should be conducted to determine if poles being used by raptors are raptor-safe.

Research and Monitoring

The subcommittee recommends that the Companies provide funding for research and monitoring in the BOPNCA. We recommend that effective monitoring be proposed at all trophic levels. Habitat restoration should be monitored in conjunction with trends in prey and raptor populations. Monitoring should focus on the effects of the new transmission lines and associated mitigation and enhancement efforts, but to be effective, it must consider resources throughout the BOPNCA.

We believe that the Draft Portfolio should specify a vegetation monitoring plan for native shrubs, grasses, and forbs that will allow an evaluation of the effectiveness of habitat restoration and an understanding of success rates. The monitoring information will be the basis for adapting the restoration approach to challenges and failures so that long-term success can be achieved. The results and findings should be considered as a model for other sites across the West where sagebrush recovery and restoration are needed.

We recommend that monitoring protocols be put in place to understand the effects of transmission lines and raptor response to nest and perch enhancement and identify any negative impacts of power line construction. Use of the new transmission lines by raptors and ravens should be monitored as it was along the PP&L 500-kV transmission line in the 1980s (Steenhof et al. 1993).

Monitoring trends in raptors nesting on transmission lines must be carried out in conjunction with monitoring population trends throughout the BOPNCA. The Ferruginous Hawk should be a priority for monitoring because it is the species most likely to respond to transmission lines within the BOPNCA Priorities and approaches for monitoring raptors throughout the BOPNCA should follow recommendations from the Raptor Monitoring Workshop held in June 2008 (Attachment C). Golden Eagles and Prairie Falcons should be a high priority for monitoring because these species were cornerstones in establishing the BOPNCA and because a large set of background data has been collected on them. The Golden Eagle is a good indicator raptor species because it relies on black-tailed jackrabbits, and the jackrabbit's status is associated with shrub habitat. The Prairie Falcon is a ground squirrel specialist and is sensitive to changes in ground

squirrel abundance as a result of climate change and habitat alteration. Prairie Falcon nesting populations in the canyon have not been assessed since 2003. Future studies should be designed to assess whether these three important species are or are not adapting to habitat changes that have occurred. Species that respond favorably to shrub loss (e.g., northern harriers [*Circus cyaneus]*, short-eared owls [*Asio flammeus]* or agricultural development (e.g., Swainson's hawks [*Buteo swainsoni]*, red-tailed hawks [*Buteo jamaicensis*], American kestrels [*Falco sparverius]*) should be a lower priority for research and monitoring.

We recommend that the Draft Portfolio also provide for monitoring trends in small mammal populations that are key prey species (ground squirrels and jack rabbits) on a landscape level throughout the BOPNCA. The monitoring of small mammals should be coordinated with raptor monitoring.

New and improved access roads associated with transmission line construction and operation could increase recreational shooting near the lines. There is a concern that elevated soil concentrations of lead from shooting and trash and litter accumulation could have long term impacts on prey and raptor populations. The Companies should propose studies that evaluate the extent of lead in the environment in the BOPNCA and examine potential solutions. There also may be a need to examine the effects of recreational shooting on raptor and prey populations.

Proposed research and monitoring should recognize and take advantage of previous work undertaken within the BOPNCA. This component should include the resources necessary to perform an integrated and adaptive approach. We view the oversight committee as being critical in helping to define both integrated research objectives and monitoring needs of the area. Biologists from several agencies and universities are currently conducting research projects within the BOPNCA. We recommend that the oversight committee be proactive in focusing, prioritizing, and integrating these and future research efforts to ensure that they address BLM's long-term and short-term needs in a coordinated way. The Companies should consider funding a repository for archiving and disseminating data collected in the BOPNCA to be used by both researchers and managers. The NCA Research Group recently identified a need to compile available data from previous studies and monitoring efforts, and to make these data available and accessible. We recommend formalizing and expanding the research and monitoring program to maximize the benefits and leverage additional funding opportunities. One possibility would be to create an endowment (see below) to fund research and monitoring into the future.

Visitor Management

We are pleased that the Draft Portfolio includes funding for enhanced BLM law enforcement patrols. This funding should continue for the duration of the permit. An expanded on-site presence will reduce degradation caused by irresponsible public recreational use. Partnering with local communities and civic groups could expand opportunities for visitor contact within the

BOPNCA. Again, the oversight committee can provide guidance about this important component of the Draft Portfolio.

The BLM already has an excellent public education program for the BOPNCA. It employs a full time Environmental Education Specialist, dedicated to the BOPNCA. This specialist gives more than 100 presentations at schools and special events each year and contacts more than 8,000 individuals. The BLM has a sign management plan for the BOPNCA, maintains a website about the BOPNCA, and has developed a visitor's guide that contains general maps of the BOPNCA, raptor viewing information, and recreational opportunities. Public education about NCA raptors and their habitat also occurs at the Peregrine Fund's World Center for Birds of Prey, the Idaho Fish and Game's MK Nature Center, Canyon County's Celebration Park visitor center, and the Kuna Chamber of Commerce visitor facility. The Snake River Raptor Volunteer group is also involved in public education. The subcommittee finds that public education is currently closer to meeting objectives than other programs.

Land Purchase

The Companies' recommendation for property purchase was based on enhancing the preservation of cultural resources. We recommend re-evaluating whether land purchase should be a priority or whether it would be best to invest funds in an endowment (see below) to enhance all resources and values over a longer time frame. If land purchase is a component of the enhancement package, some degree of funding should be included to help manage these lands.

Fund Management

The Subcommittee believes that BLM should explore establishing a fund located with a third party, such as an Idaho state agency, to receive and manage enhancement funds on behalf of the BLM. The state agency would distribute funds at the direction of BLM with the advice of the Implementation and Oversight Committee.

Implementation and Oversight Committee

The Companies have suggested creating and funding an oversight committee to make recommendations to the BLM on the implementation of the enhancement program. We recommend that the oversight committee include interested and involved people with local expertise on each of the trophic levels (plants, prey, and raptors). The structure, responsibilities and management of the oversight committee have yet to be determined. One option is for the oversight committee to be a subcommittee of the Boise District RAC. However, we view the oversight committee as being critical to the long-term sustainability of the BOPNCA and the Companies' success with implementation of the Draft Portfolio. We recommend that the BLM establish the oversight committee as soon as feasible and seek their involvement in the immediate and long-term decisions needed to sustain the integrity of the BOPNCA.

Duration of the Enhancement Components

The BLM should ensure that adequate funding is provided for enhancement components during the period for which the right-of-way permit is granted. Contingencies for responding to fires that may impact restoration areas should be included in the permit. The relevant issues should be revisited to determine if the goals of enhancement have been met when the permit is renewed.

Allocation Prioritization

We respectfully attempt to categorize and prioritize the efforts and funding implied in the Draft Portfolio. We recommend that the BLM consider the enhancement components in the following order of priority:

- Enhancement of Raptor Populations
- Habitat Restoration
- Research and Monitoring
- Implementation and Oversight Committee
- Visitor Management
- Land Purchase

We believe it is important that the BLM ensure adequate funding for all enhancement components. It is especially important for the first four categories listed above.

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Steenhof, K., M.N. Kochert, L.B. Carpenter, and J.A. Roppe. 1993. *Nesting by raptors and common ravens on electrical transmission line towers.* J. Wildl. Manage. 57(2):271-281.

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ATTACHMENT A

Comments on the Gateway West Enhancement and Mitigation package from Michael N. Kochert

01/05/2014

To: Gateway West Subcommittee co-chairs
Fr: Michael N. Kochert
Re: **Comments on the Gateway West Enhancement and Mitigation package.**

Thank you for the opportunity to attend your 17 December 2013 meeting on the Gateway West transmission line and to hear the presentation describing the Enhancement and Mitigation plan for the Morley Nelson Snake River Birds of Prey National Conservation Area (NCA). This message is a follow-up to my oral comments at the meeting.

As a matter of introduction, I have conducted and directed research and monitoring of raptors, prey, and vegetation in the NCA for nearly 45 years. I also studied colonization and use of the 500 kV PP&L (PacifiCorp) transmission line by raptors and ravens with agency and industry colleagues for 10 of those years.

My comments are as follows:

1. I commend Idaho Power and Rocky Mountain Power for the comprehensive package, and I commend the BLM Boise District and NCA staffs for their input to the effort.

2. The NCA was established by the U.S. Congress because the area contains an internationally unique aggregation of nesting raptors, and the legislation calls for protection and enhancement of the unique raptor nesting populations. Given that, most of my comments are predicated on the premise that major actions in the NCA need to consider the ultimate effect on the unique raptor resource.

3. Although the Enhancement and Mitigation package is quite comprehensive, a major deficiency of the package is that it lacks a monitoring component. Given that the package identifies a fairly substantial investment for many enhancement and mitigation actions, it is very important to evaluate the effectiveness of those actions. For example, I sensed at the meeting that there was not complete agreement on the predicted success rate of the habitat restoration efforts. As I stated at the meeting, I commend the parties involved for proposing to undertake such a challenging effort. However, given the extremely dry climate in the NCA in the recent past and predicted for the future, success of restoration efforts in the low precipitation zone in the Grand View and Bruneau areas could be extremely low. Even in decent precipitation years vegetation restoration in these areas could be a challenge. Given the uncertainty, I believe that restoration efforts should be monitored for effectiveness.

   I suggest that the Enhancement and Mitigation package provide for development of a comprehensive, peer reviewed monitoring plan. The monitoring efforts, if designed

properly, would provide the opportunity to for adaptive management experiments. The plan should identify the metrics for success. For example, will restoration success be a measure of vegetation in the restored areas or will it be prey composition and density, or reproductive performance of the nesting raptors?

4. Because construction of the transmission lines and the major proposed enhancement actions has the potential to ultimately affect the raptor populations, I believe it is incumbent to monitor the status of the major raptors in the area. I believe that colonization of the transmission line should be monitored much like it was done with establishment of the PP&L 500-kV transmission line in the 1980s (Steenhof et al. 1993). The monitoring of the PP&L line provided valuable information to the utility, and it also identified the effect of the line on the raptor and raven population.

   It seems to me that the goal of the large-scale restoration efforts is to enhance the habitat and ultimately enhance or maintain the raptors. In my opinion, evaluating the effectiveness of large-scale restoration efforts without assessing raptor populations is falling short of completely evaluating the effectiveness of restoration efforts. A well-designed monitoring effort at the three main trophic levels would serve as a good adaptive management experiment for the restoration efforts.

5. I noticed that the Enhancement and Mitigation package did not mention or address raptors. I believe that that installation of nesting platforms can be an important enhancement and management effort. We found from our long-term research on the PP&L transmission line that the nesting platforms enhanced raptor nesting success (Steenhof et al. 1993). We also found that, when place properly, nesting platforms can attract raptors to nest below the conductors. For example, in all cases where Golden Eagles nested in towers with nesting platforms below the conductors, eagles nested in the platforms and in no other position of the tower. When planning for the 500-kV transmission line in the late 1970s, the PP&L (PacifiCorp) sought Morley Nelson's advice about placement of nesting platforms to enhance raptor nesting opportunities on the transmission line. During my work on the PP&L transmission line project I observed that PP&L personnel readily climbed to the nesting platforms located just above the waist below the conductors and performed work in the nest without the need to shut down the transmission line.

6. I have no problems with the proposal to removal of 8 miles of existing 46-kV transmission line between Bowmont and Gage substations. However, I suggest that IPC leave the existing poles and cross arms to reduce the cost of removal and to provide nesting and perching opportunities for raptors.

7. Several miles of 3-phase, cross arm distribution and transmission lines exist in the NCA, and electrocution of raptors has been reported on these power lines (Lehman and Barrett 2002). In my opinion, a positive enhancement effort would be to patrol untreated distribution and transmission lines for dead raptors and to retrofit any pole where an electrocution has occurred. Poles should be retrofitted using designs developed by Morley Nelson for Idaho Power and following procedures described in APLIC (2006).

Literature Cited

Avian Power Line Interaction Committee (APLIC). 2006. Suggested practices for raptor protection on power lines; The state of the art in 2006. Edison Electric Institute; Raptor Research Foundation, Washington, D.C. USA.

Lehman, R. N., and J. S. Barrett. 2002. Raptor electrocutions and associated fire hazards in the Snake River Birds of Prey National Conservation Area. Idaho Bureau of Land Management Technical.

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ATTACHMENT B

Gateway West Mitigation and Enhancement Portfolio – DRAFT GEAS Comments – February 27, 2014

Gateway West Mitigation and Enhancement Portfolio – DRAFT GEAS Comments – February 27, 2014

To: Bureau of Land Management Resource Advisory Committee Gateway West Subcommittee Co-Chairs

From: Golden Eagle Audubon Society

Re: Comments on the Gateway West Enhancement and Mitigation Portfolio, 1/10/2014

Thank you for this opportunity to comment on the Gateway West Enhancement and Mitigation Portfolio. We, the Board of Directors, write these comments on behalf of members of Golden Eagle Audubon Society (GEAS). GEAS constitutes some 1,500 members primarily residing in southwest Idaho. Our strategic focus is the conservation of birds, wildlife, and their habitats and promotion of wildlife appreciation by SW Idaho residents. Regarding the Gateway West Enhancement and Mitigation Portfolio, our primary concerns include the potentially highly inaccurate success estimate for restoration of native plant communities; the potential missed opportunities to enhance raptor nesting, perching and foraging opportunities; and the lack of a reliable monitoring strategy to track the value of proposed (and needed) enhancement and mitigation actions. GEAS would like to see the outcomes of this Enhancement and Mitigation Portfolio positively affect plants and wildlife, more specifically birds and bird habitat. The majority of our members live and bird watch in southwest Idaho and the Morley Nelson Snake River Birds of Prey National Conservation Area (SRBOP) is very dear to our membership. We propose actions that can lead directly to an overall enhancement of SRBOP for the betterment of raptors, other birds, other wildlife and their habitats, and to better enjoyment for the wildlife-loving public.

General Comments:

GEAS applauds Rocky Mountain Power and Idaho Power's (hereafter, 'the Companies') effort to work "in spirit of cooperation" to "meet enhancement requirements" (page 6) and the thoughtfulness the Companies have put forth for the need for remediation (i.e., habitat restoration component is scaled to the number of acres impacted during construction, page 35).

The Portfolio indicates that the Enabling Legislation for SRBOP, Public Law 103-64, established the SRBOP in 1993 for the "…conservation, protection and enhancement of raptor populations and habitats and the natural and environmental resources and values associated therewith, and of the scientific, cultural, and educational resources and values…." Section 2(4) of the Act defines the term "raptor habitat" to include the habitat of the raptor prey base as well as the nesting and hunting habitat of raptors within the conservation area. Furthermore, it references the 2008 SRBOP Resource Management Plan (RMP) indicating: "the SRBOP is managed by BLM under the concept of dominant use rather than multiple use. This means that prior to authorizing uses,

BLM determines the compatibility of those uses with the purposes for which the NCA was established."

Based on the Public Law and the RMP, the Portfolio states (Page 33, Sect. 8.2) that, "locating utilities within these (designated) corridors is consistent with the RMP and with the enabling legislation for the SRBOP and therefore should require no additional enhancement to be consistent with the enabling legislation." GEAS does not agree with this position. Degradation to raptor habitat as a result of powerline construction is not consistent with enabling legislation. Enhancement therefore is a required act to mitigate for reduction and damage to raptor habitat, not simply an in-kind act "in the spirit of cooperation". Further, it is the Companies responsibility as a direct economic beneficiary of the line installation to ensure – for the long-term – that raptor habitat is not degraded as a result of the powerline. The Portfolio correctly cites the SRBOP RMP stating, "to stabilize and increase the small mammal prey base, remnant upland native shrub must be preserved, interconnected and expanded (page 36)". Thus, to meet RMP objectives as well as operate in the spirit of cooperation, the Companies should be seeking to expand and inter-connect native vegetation in order to achieve objectives stated in the RMP.

GEAS contends that the Companies are in a positive economic situation right now as they have saved significant expenses by routing Sections 8 and 9 through SRBOP – a decision GEAS vocally supported with comments submitted during the Final Environment Impact Statement comment period. The Companies saved substantial dollars by using SRBOP because the route covers fewer miles, there is less need to compensate private landowners, and there are minimal new road construction costs. Funding the restoration approach we propose is not out of the realm for the Companies and is in the Companies best interests to demonstrate their social responsibility and sustainability highlighted in their business plans and reports.

Specific Comments and Recommendations

The most critical component to long-term stability of the world-renowned raptor populations of SRBOP is maintenance and enhancement of native vegetation communities that support diverse, abundant prey bases for the raptors. Therefore, GEAS provides comments that can lead to the direct actions necessary to achieve habitat restoration and enhancement goals.

GEAS proposes the use of an integrated and adaptive approach where restoration is applied. We contend that the habitat treatment success rates estimated in the Portfolio (80%) counters what restoration ecologists working in the SRBOP have found. The success of treatments in the precipitation and temperature zone occupied by SRBOP has very low restoration success for reseeding and other habitat enhancements using traditional approaches (M. Germino, D. Shinneman, and D. Pilliod, pers. comm.) due to SRBOP susceptibility to invasion by cheatgrass and accelerated fire cycle. Some habitat projects for the sole purpose of vegetation enhancement have actually increased the spread of cheatgrass. Work by Brooks and Chambers

(2011) on resistance and resilience highlights the difficulties that must be confronted by restoration efforts in these dry, low elevation areas and represents the kind of science that should be understand before implementing a restoration plan in the SRBOP.

Cheatgrass presence complicates these efforts. The invasion of cheatgrass has changed the fire frequency in sagebrush systems such as the SRBOP where, prior to cheatgrass invasions, fire occurred on average every 70 years. Cheatgrass presence has accelerated fire return intervals to 5 to 7 years, a drastic change that has completely altered habitat in the SRBOP and makes remnant stands of native vegetation a vital element of the long-term health of SRBOP and its ability to support raptors. Thus it is critical to first protect remnant sagebrush patches using firebreaks (i.e., forage kochia) as proposed by the BLM fuels experts (L Okeson, pers. comm.). As restoration activities progress, firebreaks may be modified (i.e., replaced with native vegetation to connect restored areas and planted around the newly restored and connected patches) to help ensure protection from future fire.

Likewise, much effort has been expended on habitat enhancement in SRBOP, yet we know very little about what factors influence success and failure. GEAS proposes a restoration approach that is informed by ongoing research, designed to test and improve our knowledge as restoration is implemented, spatially explicit, and timed to appropriately capitalize on optimal weather conditions.

Ongoing restoration research carried out by the NCA Restoration Working Group is well suited to inform the Companies restoration efforts as they develop new techniques and understand the importance of seasonal and annual timing of implementation as a key factors influencing success (M. Germino, D. Shinneman, and D. Pilliod, pers. comm.). The Work Group should be a key element of project planning and their published information and monitoring data should be employed as specific strategies are developed.

Restoration initiated through the Enhancement and Mitigation Portfolio should start with these data in hand. Initial restoration plots should be placed and planted so they build upon and improve the research data, and bridge to application at larger spatial extents. That is, plots should be placed in areas that will eventually connect remnant native vegetation patches and seeded/planted in a range of treatments the Work Group research shows have higher success probabilities. This approach is critical to prepare for the second, larger application: because the actual restoration implementation must be timed with optimal weather, this "learn-do" approach will increase the likelihood of success when full implementation occurs.

GEAS recommends that this restoration approach begin with the identification of the key remnant native sagebrush patches within the SRBOP that exhibit ecological integrity and are still "intact". These areas are the "base" for this type of approach. The second step would focus

restoration efforts in areas between these key remnant patches in an effort to connect these key areas together. The overall goal of this approach is to eventually create ecologically intact, large, and connected sagebrush areas important for the many species that thrive in these conditions.

The timing of restoration actions as specified above and success for restoration is dependent upon precipitation (large rain events) in the spring before restoration actions (planting, etc.) occur. It is imperative that restoration funds be flexible. Funds must be banked and allocated when the conditions are right for restoration actions. The restoration fund can be accessed when the conditions are prime for restoration actions. GEAS recommends the funding committed by the Companies be established as a Trust Fund which is managed by a Board or Oversight Committee. The Committee should have discretion to apply or reserve funding in a time-sensitive context (i.e., commit restoration funds in positive weather years). The Trust would serve a second function as a pot of 'matchable' dollars that could attract additional funds to augment restoration of SRBOPA.

As restoration actions occur, monitoring must be implemented to quantify and understand where and why success rates are high, address challenges and failures, and allow for adapting the restoration approach over the years so that the dollars spent on restoration will be successful over the long-term. The Portfolio fails to specify a monitoring effort. This is an important aspect that must be addressed and is crucial to the success of this approach. If vegetation reestablishment is the goal, then appropriate vegetation monitoring protocols must be put in place with data collected both before and after construction on the line, within the key remnant sagebrush patches, and at sites designated for restoration and mitigation.

Monitoring needs to be carefully considered and matched to expected outcomes temporally and ecologically. For example, restoration actions over a relatively small proportion of SRBOP are not likely to have measurable effects on, for example, prairie falcon populations across the entire SRBOP. It may, however, have some influence on nest success or breeding density of proximal nesting territories. Likewise, demographic response by prairie falcons may lag habitat recovery by several years. These examples illustrate the need for a thoughtful monitoring approach that begins with fine-resolution, vegetation monitoring and eventually scales to measuring the response by raptors that are most likely to be influenced by the restoration. The monitoring strategy should be implemented using an experimental design, where "control areas" and "experimental areas" are monitored so that comparisons can be made to determine successes, address failures, and inform late stage and future restoration actions accordingly. Again, this monitoring effort is critical to the adaptive restoration process and is required by BLM regulations.

GEAS proposes action on an overall approach that meets the enabling legislation and RMP guidance, employs the best science while engaging the fuels expertise at BLM, and sets the stage

for a more programmatic approach to habitat recovery in the SRBOP. Coordination between BLM land managers and ecologists, the Companies' natural resource and administrative specialists, and the NCA Restoration Working Group is critical to implement this approach. GEAS is committed to this collaborative, adaptive approach and pledges continued participation where appropriate.

Additional Comments on Enhancement and Mitigation

Recreational Shooting

Although not directly addressed in the Portfolio, GEAS members are strongly in favor of a shooting closure within 200 yards of new and existing powerlines as well as access roads. A shooting closure is consistent with and supports a range of recommendations and offerings in the Portfolio. For example, the Portfolio indicates that, "access roads … may increase the risk of vandalism … (page 32)." A shooting ban of 200 yards from roads and powerlines would be enforceable (consistent with Law Enforcement provisions, page 37) and discourage both firearm-caused vandalism and additive mortality to raptors and prey. Furthermore, we contend that one of the greatest threats shooting brings to the SRBOP is the potential for fire ignition. There are numerous incidents of target-shooting-related fire ignitions in southwest Idaho, some of which sparked immense, destructive blazes. Wildfire is a recognized threat to native vegetation (and consequently small mammals and raptors) in the SRBOP and an economic threat to the powerlines. A shooting ban would reduce all of these threats and, when paired with increased law enforcement, is completely enforceable.

Vegetation Restoration (reclamation)

Regarding plant/seed mixtures: Page 36 states "mixes should include shrubs that are suitable for small mammals." *While we don't argue with this intent, we expect that shrubs and forbs planted and seeded need to be a close match to the local soil and climate conditions… i.e., native plants. It's important this is clearly stated.*

Regarding the need for better (more accurate and precise) maps of proposed restoration: I.e., "… developing a geodatabase layer using the proposed facility locations and then overlaying that "footprint" database, whether for construction or operation footprint, with the relevant vegetation or land ownership geodatabase layer." GEAS recommends the restoration effort be fully informed with highly accurate spatial data and planning. SRBOP is one of the best-mapped areas in Idaho with a long history of spatial data. In preparation for spatial planning, the best available data on historic restoration activity and restoration research should be overlaid with topography, soils, fire perimeter and other GIS layers to ensure proper construction sighting, mitigation siting and restoration actions.

Page 36: "in accordance with the RMP, habitat restoration projects should be located in areas where it is most beneficial to raptor prey populations" therefore a spatial component to the restoration exercise is essential.

Need 'security' fund for fire response on top of management; page 32 cites a concern that "access roads … may increase risk of vandalism, weed infestation, litter, etc." We feel that the increased risk of fire ignition is the most critical threat posed by increased access. Some 80% of fire ignitions in the NCA are human-caused (L. Okeson, pers. comm.). We agree, that access also means quicker response to fire ignition but we also know that fires expand rapidly. Therefore we suggest a dedicated effort to sign the areas regarding risks and costs of wildfire and a proactive effort to deter ignitions (including a firearm ban).

Raptor nest/perch augmentation

Proactive retrofitting is an important element especially to honor the intent of the NCA as a world-renown site for Birds of Prey (NCA not an end unto itself … they are identified and situated for specific resource functions; SRBOP specifically designated for raptors, use for other purposes must be compatible with enhancements for BOP). GEAS recommends retrofitting existing structures where appropriate to enhance nest and perch sites for raptors.

Leave structures on removed lines

Page 39 and 40, referring to removal of Swan Falls to Bowmont line and Mountain Home to Bennet line: GEAS recommend the Companies do not remove structures that are suitable for raptor and raven nest and perches. We recognize there may be safety considerations but recommend that all structures that are not deemed unsafe be left. In addition to opportunities for raptors and ravens, many cavity nesting (excavators and secondary) will benefit from the nest site opportunities. Furthermore, a wide variety of birds would benefit for the elevated perch opportunities.

We recommend that cost savings of structure removal be redirected to (1) decommissioning and restoration of the service roads for these lines (thus improving and protecting slickspot peppergrass habitat), and (2) enhancements on the primary lines.

GEAS recommends the Enhancement Portfolio reference using 'state of the art' guidelines to add desirable nest opportunities.

Monitoring

As stated above, monitoring needs to be a specific element of the Portfolio. GEAS recommends that the Portfolio references the BLM Assessment Inventory and Monitoring program and any local (i.e., NCA specific) monitoring protocols and specifically describes the need for targeted monitoring of vegetation response to restoration, small mammal population trend, and raptor response to nest and perch enhancement. Monitoring is best conducted under an experimental design so trials inform subsequent efforts and expenditures.

Vegetation

Page 36: … "to stabilize and increase the small mammal prey base, remnant upland native shrub must be preserved, interconnected and expanded." Monitoring of upland native shrub is critical to measure success of restoration actions.

Prey base

Page 36: Citing the SRBOP RMP: the greatest benefit to raptors is in the stabilization of the prey base" thus no amount of restoration nor reclamation will meet RMP standards unless the prey base responds and the only way to accurately test this is through monitoring of the prey populations themselves.

Raptors

Monitoring protocols should be put in place to understand the effects of the line and help target measures to address any negative impacts through further management action. Ultimately enhancement measures should improve or at least maintain current population numbers in the area.

Again, Golden Eagle Audubon Society Board of Directors appreciates this opportunity to comment on the Gateway West Enhancement and Mitigation Portfolio. We look forward to further engagement in successful siting of the Gateway West line in SRBOP and in successfully enhancing native vegetation, small mammal, and raptor communities in southwest Idaho.

On behalf of the Golden Eagle Audubon Society Board of Directors,

Sean Finn
Conservation Committee Chair
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ATTACHMENT C

Summary of Findings and Recommendations for Raptor Monitoring Generated from the Workshop on Monitoring Raptor Status and Trends in the NCA

Summary of Findings and Recommendations for Raptor Monitoring Generated from the Workshop on Monitoring Raptor Status and Trends in the NCA

Staff from the BLM Boise District and the US Geological Survey (USGS) Forest and Rangeland Ecosystem Science Center (FRESC) planned and implemented a workshop in June 2008 to form a strategy to monitor raptors in the NCA (USDI 2008). The workshop included 37 scientists, specialists, and managers met to "develop an adaptive management framework for raptor monitoring for the NCA to include regular long-term monitoring to assess raptor status, and monitoring related to specific management or projects."

Objectives of the workshop were to:

1. prioritize raptor species for long-term monitoring,
2. recommend efficient wildlife monitoring designs to assess the conservation and enhancement of raptor populations and habitats in the NCA, and
3. propose how raptor (and/or other species) monitoring can be used to evaluate vegetation treatment projects implemented in the NCA

This attachment summarizes findings and recommendations of the workshop group that addressed monitoring raptor status and trends in the NCA. A full report of the workshop is presented in USDI (2008). Workshop participants recommended that monitoring should be designed to detect change and prompt a management decision if change exceeds an acceptable standard or pre-determined threshold. In general, upon detecting an unacceptable change or trend, additional investigation(s) should be conducted to gain more detailed understanding of cause-effect relationships, mechanisms, etc.

RESPONSE OF WORKSHOP PARTICIPANTS TO THE QUESTIONS:

Because questions 1 and 2 are interrelated, both questions were addressed simultaneously in discussing the approaches for the different species.

Question 1. Which raptor species warrant intensive long-term monitoring and what monitoring designs are effective for assessing the status of these species, as well as generate information on the other raptor species?

Question 2. How often should various raptors be surveyed and what should be the periodicity of monitoring

The report recommended a 2-tiered approach for monitoring raptors that included intensive monitoring for priority species and a less intensive strategy for multiple species. Workshop participants identified Golden Eagles, Prairie Falcons, Ferruginous Hawks, and Burrowing

Owls as priority species with the eagles and falcons as the top priority. The less intensive strategy would focus on the benchland and wintering raptors. Benchland nesting raptor species, specifically included Burrowing Owl, Ferruginous Hawk, Northern Harrier, and Short-eared Owl. *The term "benchland" referrers to the plain surrounding the Snake River Canyon (USDI 1996:9).* Wintering raptor species, specifically Rough-legged Hawk, Northern Harrier, Red- tailed Hawk, Golden Eagle, and Prairie Falcon.

Golden Eagles and Prairie Falcons were considered top priority because:

- These species were cornerstones in establishing the NCA
- A vast background data has been collected on them from which to detect change (40+ years for Golden Eagles and periodically over 30 years for Prairie Falcons).
- They utilize different prey that vary over time, and eagle and falcon populations fluctuate differently based on previous research
- The Golden Eagle is a good indicator raptor species because it relies on black-tailed jackrabbits, and jackrabbit status is associated with shrub habitat condition.
- The Prairie Falcon is a ground squirrel specialist during the breeding season and is sensitive to changes in ground squirrel abundance as a result of climate change and habitat alteration.
- Most Prairie Falcons leave the NCA following ground squirrel estivation, and factors affecting falcons can extend beyond the NCA. Trends in numbers may reflect conditions on and off the NCA, and migratory species, such as Prairie Falcons, may be affected more by climate change than resident species.
- The NCA contains a low number of nesting eagle pairs, and loss of a few nesting pairs should trigger new action by managers.
- Historical counts of falcon pairs have revealed high year-to-year variability
- Analyses of change can be across the NCA or more locally.
- Nesting eagles are relatively inexpensive to monitor compared with data gained.
- Surveyors can effectively gather other data (e.g., covariates).
- The NCA is one of the few places where Prairie Falcons have been studied and monitored in the long-term.
- Prairie Falcons have large home ranges that encompass much of the area within the NCA
- The Golden Eagle is a FWS Bird of Conservation Concern in BCRs 9 (where the NCA lies), 16, 17, 18 & 35, and the FWS is interested in eagle monitoring in the NCA.
- The Prairie Falcon is a FWS Bird of Conservation Concern in BCRs 9, 10, 16, 17, 18 and 32, which comprise the bulk of its range in the U.S.
- The number of Golden Eagles using the NCA approximately doubles in winter with influx from other areas

Ferruginous Hawks and Burrowing Owls were considered priority species because:

- These species nest on the benchlands above the canyon, although Ferruginous Hawks also nest in the canyon.
- They use different vegetation types and prey than Golden Eagles and Prairie Falcons.
- Ferruginous Hawks use shrub and grassland habitats.
- Burrowing Owls use grassland cover types, and owl abundance, distribution, and use of areas is likely to change if shrubland restoration succeeds.
- Preliminary data show no evidence for declines in the Ferruginous Hawk nesting population in the NCA (see Appendix 4). Monitoring would provide for a solid baseline and continued assessment of status
- The Ferruginous Hawk is a FWS Bird of Conservation Concern and BLM Sensitive Species Type 3
- The Burrowing Owl is a FWS Bird of Conservation Concern throughout most of its U.S. range (BCRs 9, 11, 16, 17, 18, 32, 33, 35, 36) and is a BLM Sensitive Species Type 5

Recommended Monitoring for Priority Species

Golden Eagles. Workshop participants recommended that the annual survey of all historical nesting territories in the NCA and in the Comparison Area (the area along the Snake River located upstream and downstream of the NCA) continue as it has for the last 40 years. The annual survey includes assessment of occupancy and productivity.

The quantitative goal of monitoring depends on the location of decline in the NCA and whether it is geographically local or widespread. The goal is to detect change (rate of change or change below an established threshold) in the number of pairs and/or productivity. Participants suggested a loss of 3-4 nesting pairs as a threshold that would trigger action

Management actions: An unacceptable change would trigger a decision to investigate what factors (e.g., fire, OHV and other human disturbance, restored vegetation, etc.,) might be associated with the change in nesting pairs or productivity, relative to the location of the change. Investigations and management actions should consider the time frame for recovery. Eagles are long-lived, which could result in a long time for recovery. The BLM should focus vegetation restoration efforts within 3 km of the canyon rim, or within 3 km of nests outside of the canyon.

Threats to Golden Eagles include vegetation type conversion from shrubs to annual grasses, and human activities - recreation (mainly OHV disturbance). [NOTE: *Abandonment equals take if caused by human activity...Diana Whittington (US FWS) stated that human disturbance to nesting Golden eagles (or the permitting of such) that causes loss of any production in a given year is a violation of the Bald/Golden Eagle Act.*]

Prairie Falcons. The group recommended monitoring falcon abundance and nesting success 3 of every 5 years. One year to consist of a full canyon survey as was done in 2002, and the other 2 years to consist of a stratified random sample of sections of canyon with high and low nesting densities as was done in 2003.

Information from assessing annual nesting success could be adequate to monitor Prairie Falcon reproduction in the NCA because nesting success [the proportion of preselected pairs raising at least one young to ≥30 days of age (see Steenhof and Newton 2007)] and productivity (mean number of young reaching ≥30 days of age per preselected pair) are highly correlated. It cost about $120,000 to conduct a full canyon survey and collect productivity data in 2002. Using the cost of a full canyon survey with productivity as a base, a full canyon survey with just nesting success would reduce the base cost about 15% and a stratified random sampling effort like that used in 2003 combined with only assessing success would reduce the cost by about 35%. Information on other species (i.e., Red-tailed Hawk and Ferruginous Hawk) also can be collected from the Prairie Falcon point-count surveys.

Participants recommended that the quantitative goals of monitoring be to 1) identify trajectories in the number of nesting pairs and/or nesting success occurring over multiple years in a geographic cluster within the survey area, 2) detect substantial changes in the number of nesting pairs and/or nesting success across larger areas (*substantial change was not defined at the workshop*), and 3) ascertain when the number of pairs falls below the historical minimum of 160 recorded in 1994. Some members of the group cautioned about using absolute thresholds. These levels should serve as triggers for further investigation not as triggers for panic.

Management actions: A decline in the number pairs or nesting success beyond the acceptable level would trigger a management decision to investigate the reasons for the decline. The 1997 survey was a good example of this management process. Results from long-term surveys in selected stretches of the canyon in 1997 indicated a significant decline in the number of falcon pairs. NCA management implemented a full canyon survey in 2002, and results indicated that the number of nesting pairs that year was back at historical high levels.

Recommendations for less intensive monitoring for multiple species

Raptors that nest on the benchlands. Workshop participants recommended that monitoring focus on:

- Burrowing Owls
- Ferruginous Hawks
- Northern Harriers
- Short-eared Owls.

The Burrowing Owl should be a focal species for the ecological communities on the benchlands. Short-eared Owls and Northern Harriers can be nomadic, and numbers vary widely from year to year in the NCA, which is an important consideration for the monitoring design. Year to year changes in local numbers are likely to reflect nomadism as much as they reflect population changes. The Short-eared Owl is a FWS Bird of Conservation Concern and a BLM Sensitive Species (type 5). Swainson's Hawk were not a great concern in the NCA because of low number of pairs.

Recommended monitoring approach: The standardized roadside point-count survey method described in Conway et al. (2008) and Conway and Simon (2003) was recommended for surveying Burrowing Owls and the other species. Routes should be established with some structured sampling frame. Conway and Simon (2003) recommend one route per township. Participants recommended using the existing road network for transects and broadcast surveys for Burrowing Owls and the other species where applicable. When pairs are located, surveyors can search the area of activity to find a nest and assess productivity or nesting success.

Workshop participants recommended that the use of transects for multiple species should be examined further to address the following:

- whether transects should be surveyed year round.
- what information would be collected from the transects–trend over time?
- how nesting success can be assessed from transects.
- what changes can be detected to trigger a management decision?

Wintering raptors. The following species were identified for monitoring on the benchlands:

- Rough-legged Hawk,
- Northern Harrier
- Red-tailed Hawk
- Golden Eagle
- Prairie Falcon

Some participants felt that a measure of raptor use would be a good indicator of restoration success. [*There were differing opinions on this statement. Some Group I participants and Group III (see Statement 1 of Question 2 of Group III) did not agree with the statement, and Group II felt that the approach should be evaluated (see recommendation 4, Question 1)].*

Data from past studies should be evaluated to assess if comparisons can be made with new survey data. John Doremus collected wintering data on certain species. Bill Mattox and James McKinley surveyed road transects from 1998 to 2005 that included all raptor species detected in the Orchard Training Area within the NCA. Also Watson et al. (1996) recorded raptor

species occurrence collected from randomly distributed point counts during the BLM/IDARNG Research Project

Recommended monitoring approach: Participants believed that point-count surveys could be conducted from randomly dispersed points or points along transects. The group recommended use of the roadside point-count survey method. A monitoring plan should consider surveying year-round benchlands road transects during the two years in five when Prairie Falcon monitoring is not being done (see Prairie Falcons 2,a above). [*Note: the recommended periodicity (number of times in a year) of the surveys was not discussed at the workshop and will be addressed in the NCA monitoring plan*]. Workshop participants recommended that surveyors collect other data (e.g., weather, habitat, land use, etc.) as covariates to detect factors influencing birds. The specific covariates will be identified in the planning process. Also the monitoring design should consider stratified random sampling based on management needs.

General Discussion. Some participants suggested the BLM identify and monitor raptor migration corridors in NCA. Also, some asked if we are comfortable with our knowledge of status and our estimates for raptors in NCA (excluding Prairie Falcons and Golden Eagles). Also should the BLM consider a comprehensive assessment / inventory as a basis for monitoring the status of species and their response to management activities?

Question 3. Which raptor species provide the most reliable data to evaluate long-term (i.e., 20 years) habitat restoration success across the NCA?

Golden Eagles and Prairie Falcons were listed because these two species have different primary prey species that are associated with shrubland habitats. Black-tailed jackrabbits (the eagle's main prey) require shrubs. Although Piute ground squirrels (the falcon's main prey) do not require shrubs, their populations are more stable in shrub habitats. Eagles have a relatively small home range compared to the falcon's large home range, which provides managers with a reflection of impacts at different scales and locations. The Golden Eagle population is relatively stable vs. Prairie Falcon's variability in occupancy/productivity.
Raptor use of restored areas vs. untreated areas needs to be assessed, but the challenge is how to do it. Some participants suggested using solar powered GPS satellite-received transmitters on female Prairie Falcons to assess use of treated and untreated areas. *Note: Some participants felt that data from males might be more revealing if transmitters of the appropriate size are available.* Participants recommended that treatment and control experiments should be monitored before, during, and after treatments.

RESEARCH QUESTIONS

The group suggested that protocols be established to assess the array of research questions so that studies can complement each other. Participants identified the following research questions:

- Why are some Golden Eagle territories that have burned more productive than others? (Diet studies may be one way to approach this question.)
- What is the trade-off of using non-natives in vegetation restoration vs. no action?
- Can Loggerhead Shrikes be used as an indicator of restoration success?

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Appendix I

Appendix I

SEIS Scoping Report

SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT SCOPING REPORT

Gateway West Transmission Line Project

Prepared for:

Bureau of Land Management

January 7, 2015

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1.0 INTRODUCTION

This report describes the public scoping process for the Gateway West Transmission Line Project (Gateway West or Project) Supplemental Environmental Impact Statement (SEIS). It documents outreach efforts, summarizes the comments received, and identifies any issues raised and suggested alternatives to the proposed action. Comments will be addressed in the Draft SEIS rather than in this summary. The document has been prepared for the public, the decision-maker, and SEIS team members to easily see the common themes in scoping comments, and issues. Issues generated from these comments, as well as issues considered in the 2013 Final Environmental Impact Statement (FEIS) will be used to analyze Project effects in the Draft SEIS. The Draft SEIS will include a table with a brief description of how each comment was handled during development of the Draft SEIS.

The U.S. Department of the Interior, Bureau of Land Management (BLM) conducted scoping initially in 2008. In the summer of 2009, additional routes were added for consideration and the BLM asked for additional comments. The original set of issues developed from these scoping comments are attached as Appendix A. Additional scoping comments submitted for the SEIS, as well as the codes used to group like comments, are grouped by issue and attached as Appendix B. Scoping is an ongoing process, and comments received after the close of the SEIS scoping period (October 24, 2014) will be considered in the SEIS when it is feasible; however, those comments have not been summarized in this report.

1.1 BRIEF PROJECT DESCRIPTION

On May 7, 2007, Idaho Power Company and PacifiCorp (doing business as Rocky Mountain Power), collectively known as the Proponents, applied to the BLM for a right-of-way (ROW) grant to use the National System of Public Lands for portions of the Project. The original application was revised in October 2007, August 2008, May 2009, and January 2010 to reflect changes and refinements in their proposed Project and in response to feedback from the public regarding routing alternatives. The Plan of Development (POD) has been revised several times in response to Project changes and recommendations from BLM, other reviewing agencies, and public comment. The Proponents submitted a revised application for Segments 8 and 9 in August 2014. The BLM will consider this application in accordance with 43 Code of Federal Regulations (CFR) 2800, and decide whether to issue the ROW Grant for one or both of these segments.

The original Project consisted of rebuilding one 230-kilovolt (kV) line and constructing two new 230-kV lines between Windstar and Aeolus; a 345-kV line to connect the new Anticline Substation to the existing Jim Bridger Substation; and 500-kV system from Windstar to Hemingway, comprising 10 transmission line segments with a total length of approximately 1,103 miles. The Project would extend from the Windstar Substation (located near the Dave Johnston Power Plant in Glenrock, Wyoming) to the Hemingway Substation (located near Melba, Idaho, approximately 20 miles southwest of Boise, Idaho). The eastern route 230-kV line and the 500-kV line between Windstar and Aeolus were dropped prior to the Draft Environmental Impact Statement (DEIS), resulting in a Project with a total length of approximately 1,000 miles.

The BLM published the FEIS for this Project on April 26, 2013, and a Record of Decision (ROD) on November 14, 2013. In that ROD, the BLM deferred offering a ROW grant for 2 of the 10 segments (e.g., Segments 8 and 9) to allow additional time for federal, state, and local permitting agencies to examine additional options regarding routing of these segments as well as mitigation and enhancement measures for these segments.

New information has become available since the publication of the FEIS and ROD regarding Segments 8 and 9. The BLM requested the Boise Resource Advisory Council (RAC) to establish a subcommittee to examine options for resolving siting issues associated with Segments 8 and 9. The RAC subcommittee considered numerous routing, most of which were similar to the routes already considered in the FEIS. They also considered design options not previously studied in detail. The majority of the subcommittee members submitted a set of recommendations to the full RAC. The RAC adopted the majority recommendations and submitted these to the BLM. The Proponents adopted the RAC recommendations and revised their application in August 2014. They also submitted a draft Mitigation and Enhancement Portfolio (MEP) with their application. The MEP contains proposed mitigation and enhancement measures, including compensatory mitigation, and other measures intended to enhance resources and values found in the Morley Nelson Snake River Birds of Prey National Conservation Area (NCA).

Project activities include construction of two 500-kV transmission lines and associated access roads and communication sites. The support structures would generally be steel lattice structures. A portion of Segment 8 would be located 250 feet from an existing 500-kV line, rather than 1,500 feet from this line as proposed in the FEIS. A portion of Segment 9 would involve removal of an existing 138-kV line and construction of a new double-circuit line, with both the 138- and 500-kV lines on new steel pole structures. These design features are included in the Proponents' new application and were not addressed in the 2013 FEIS. These design features and the new information provided in the Proponents' MEP are the main drivers in determining the need to prepare a supplement to the FEIS.

Figure 1 shows the Proponents' revised proposed routes for Segments 8 and 9.

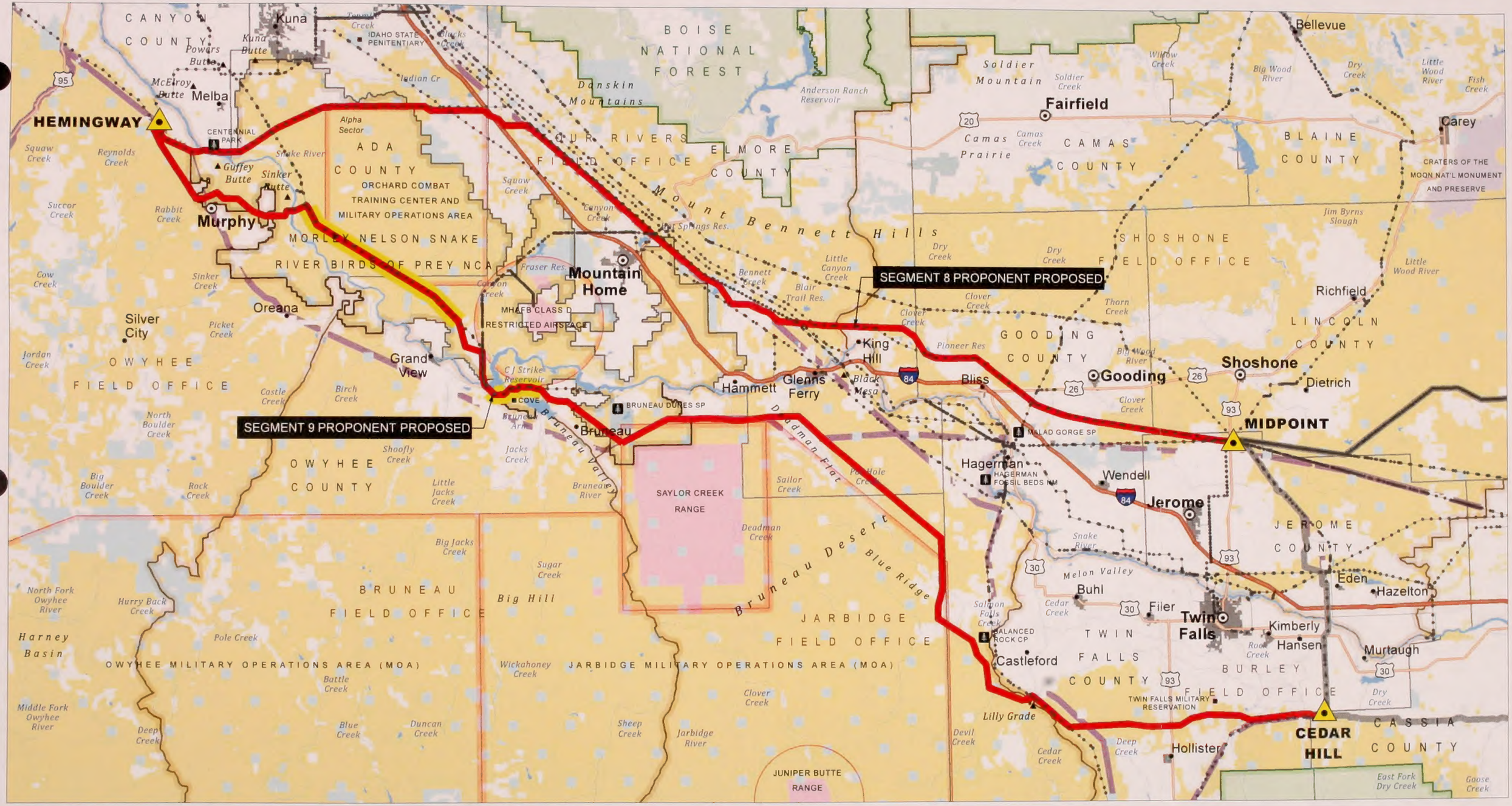

Figure 1 Segments 8 and 9 Proponent Proposed Routes

Sources: BLM, USFS, ESRI

Gateway_West_SEIS_Proposed Routes Overview scott flinders 10/1/2014

2.0 SCOPING PROCESS

This section provides a description of the public scoping process, the techniques that were used to notify the public about their opportunity to be involved in scoping, and a brief summary of the public scoping meetings. The scoping comment period began on September 19, 2014, and ended on October 24, 2014.

2.1 SCOPING ANNOUNCEMENTS

Initiation of the EIS process and the public scoping meetings were announced through the *Federal Register,* press releases, and the BLM Idaho Project web site (http://www.blm.gov/id/st/en/prog/nepa_register/gateway-west.html) as described below.

2.1.1 Federal Register

The Gateway West public scoping process began with the publication in the *Federal Register* of BLM's Notice of Intent (NOI) to (1) prepare an SEIS to support BLM's consideration of the Proponents' August 2014 application for a ROW grant to use public lands for portions of the Gateway West Transmission Line Project; and (2) conduct public scoping meetings. The NOI was published on September 19, 2014 (Volume 79, Number 182, pages 56399 to 56401). The NOI is presented in Appendix C-1 and on the Project web site, referenced above).

2.1.2 Scoping Materials

BLM prepared news releases to introduce the Project, announce the scoping period, and publicize the scoping meetings and their respective locations. The news releases were posted on the Wyoming BLM Project web site (see BLM News Releases contained in Appendix C-2). The "Why Are We Here" handout distributed at the scoping meetings is included in Appendix C-3.

2.1.3 Media Releases and Public Service Announcements

Announcements regarding the public scoping meetings and scoping process were issued as news releases to local and regional newspapers, radio stations, and TV stations in Idaho and Wyoming. Legal notices were published in the newspapers of record. **Table 1** shows the newspapers that printed the legal notice.

Table 1. Legal Notices in Newspapers of Record

Publication	Publication Location
The Idaho Statesman	Boise, Idaho
Kuna Melba News	Kuna, Idaho
The Owyhee Avalanche	Murphy, Idaho
Glenns Ferry Gazette	Glenns Ferry, Idaho
Mountain Home News	Mountain Home, Idaho

Flyers with information about public meetings were posted at various public locations in communities where meetings were held. A list of locations is shown in **Table 2**.

Table 2. Meeting Posters Displayed in the Community

Business/Building	Location
Arctic Circle	Kuna, Idaho
Kuna Public Library	Kuna, Idaho
Paul's Market	Kuna, Idaho
U.S. Bank	Kuna, Idaho
U.S. Post Office	Kuna, Idaho
Murphy General Store	Murphy, Idaho
Owyhee County Courthouse	Murphy, Idaho
Owyhee County Historical Museum	Murphy, Idaho
U.S. Post Office	Murphy, Idaho
Cooks Food Town	Gooding, Idaho
Franklin Building Supply	Gooding, Idaho
Gooding City Hall	Gooding, Idaho
Gooding Public Library	Gooding, Idaho
Lupita's Boutique & Tienda	Gooding, Idaho
Main Locke Insurance	Gooding, Idaho
Ridley's Food & Drug	Gooding, Idaho
U.S. Post Office	Gooding, Idaho
Wells Fargo Bank	Gooding, Idaho
Ziggy's Gas & Grub	Bliss, Idaho

2.1.4 Public Scoping Meetings

BLM hosted four public meetings in October 2014 to provide planning and National Environmental Policy Act (NEPA) information to the public and agencies and allow them to identify issues and concerns to BLM. Public scoping and the scoping meetings were publicized on the BLM project web site, and through the local media. As summarized in **Table 3**, a total of 189 members of the public attended the various public meetings.

Table 3. Public Scoping Meeting Dates, Locations, and Attendance

Meeting Date	Meeting Location	Attendance
October 7, 2014	BLM Boise District Office Boise ID	44
October 7, 2014	Kuna Senior Center Kuna, ID	51
October 8, 2014	Gooding Fairgrounds Gooding, ID	9
October 9, 2014	Owyhee County Historical Museum Murphy, ID	85
	Total Attendance	**189**

A scoping packet was provided to all who attended the public meetings and is also available on the BLM's web site (http://www.blm.gov/id/st/en/prog/nepa_register/gateway-west.html).

3.0 COMMENT ANALYSIS

3.1 COMMENT ANALYSIS

The Council on Environmental Quality regulations for implementing NEPA define scoping (CFR 40 §1501.7) as a way to determine the scope of the analysis, significant issues to be analyzed and non-significant issues.

To accomplish this, all comments submitted were reviewed by a team of analysts. The team was instructed to organize comments in the following four categories:

- Purpose and Need for the Project.
- Alternative Development Comments – These are comments that indicate another alternative needs to be reviewed.
- Alternative Description and Mitigation Measures – These comments suggest modifications to already defined alternatives that reduce or avoid potential impacts.
- Effects Analysis – These comments specify concerns over the effects on resources or suggest effects that need to be considered and disclosed.

3.2 PROCESSING COMMENTS

The BLM received the comments reviewed for this report in a variety of ways—written and electronic comments submitted at the scoping meeting, written and electronic comments submitted to the BLM during the scoping period, and electronic comments submitted to the BLM web site. All communications received were saved electronically, stored in the communications management system, and assigned a comment number; available information about the commenter was also captured (e.g., name, address, e-mail). If multiple versions of the same communication were received, the original communication was assigned a NEPA number and added to the communications management system. Although subsequent versions were not added to the database in order to prevent duplication, all contributing commenters were documented and assigned to the original communication.

Once a comment was identified as being one of the types listed above, it was coded to correspond with a category shown in Table 4 (in the next section). Some comments fit into more than one category. The coding structure was established before analysis began, so not all of the codes listed were used. The list of comment codes is included in Appendix B. In total, 74 letters and cards, 36 emails, and 3 phone calls were received. In addition to these comments, applicable public and agency comments from the original NEPA effort were considered (see Appendix A to this report).

3.3 SCOPING COMMENT SUMMARY

A total of 740 individual comments were identified and coded. The major comment categories are presented in **Table 4**. Appendix B to this report includes the list of codes (Appendix B-1) and a table with the coded comments (Appendix B-2).

Table 4. Main Comment Categories

Category (codes)	Number
Comments on the NEPA process and the scope of the analysis (10000, 15000, 18000, 45000, 46000)	34
Comments on the purpose and need (11000)	4
Comments on the proposed action (14000, 47000, 48000)	33
Comments on the relationship to other federal policies, including use of Designated Corridors (12000, 13000)	15
Comments that were considered "out of scope" other than comments on segments 1-7 and 10 (10010)	7
Comments on Tribal consultation and treaty rights (21000)	0
Comments in support of the project and/or the proposed action (16000, 50010, 51010)	154
Comments in opposition to the project (17000)	4
Comments on other routes and general comments on segments 8 and 9 (50000, 50020, 50030, 51000, 51020, 51030)	50
Comments on general environmental issues (22000)	0
Comments on Mitigation, Enhancement, and Monitoring (19000, 20000, 35010 to 35040)	70
Comments on land use and related issues (34000 to 35000)	105
Comments on wildlife, wildlife habitat, and vegetation (27000 to 27040, 28000 to 28080),	94
Comments on scenery and visual resources (23000)	26
Comments on cultural resources and historic trails (24000, 24010)	21
Comments on socioeconomic issues (25000 to 25060, 26000)	56
Comments on agriculture other than economic (37000)	8
Comments on recreation (36000, 36010, 36020)	12
Comments on minerals, soils, paleontological resources (29000, 30000, 32000)	0
Comments on water resources and use ((33000)	6
Comments on air quality, including greenhouse gases (39000)	1
Comments on transportation (38000)	15
Comments on geologic hazards, safety, and electrical environment (31000, 40000, 41000, 42000)	17
Comments on projects effects on the State and Counties (57000, 58000)	5
Comments on cumulative effects (43000)	3
Comments on consultation other than Tribal (44000)	0

4.0 ISSUES IDENTIFIED DURING SCOPING

4.1 NEPA PROCESS

Comments focused on what the SEIS should include and how the SEIS would relate to the FEIS. The State of Idaho and others commented that the NEPA analysis should not be duplicative of the work done in the FEIS and must be limited to new routes developed in the scoping process. Other comments (including from environmental organizations) suggested that a wide range of routes and/or alternatives must be considered in this analysis. Some specifically recommended that all RAC options be considered in the analysis. One organization commented that segmenting the project decision was a violation of NEPA and that all of Segments 8 and 9 must be considered in this analysis. Several people thought one or all of Segments 1 to 7 and 10 should be reconsidered now that the 1,500-foot separation requirement has been revised.

Some comments recommended specific literature or other information that should be used in the analysis. Some stressed the importance of acquiring complete baseline data for the analysis and/or the use of best available science. The need to evaluate the MEP in the SEIS was identified as an important component of the NEPA analysis in many of the comments.

4.2 PURPOSE AND NEED FOR THE PROJECT

Several comments questioned the need for the Project or the need to construct two new lines rather than one. Some landowners suggested there was no need to build new lines and recommended adding the new lines to existing towers.

4.3 PROPOSED ACTION

The majority of comments supported the proposed routes; however, many comments questioned the adequacy of the MEP filed as part of the proposed action. Some comments also questioned the adequacy of the mitigation proposed for areas outside the NCA. The State offered to assist the BLM in developing mitigation and enhancement measures.

Several comments recommended that all of Segment 8 (e.g., from Midpoint to Hemingway) be co-located with an existing line. Some stated that Segment 9 should also follow existing lines. Several comments questioned the need for two separate lines or thought that Segments 8 and 9 were alternatives to each other.

Two environmental organizations requested that the proposed action be tiered to the current Idaho Comprehensive Wildlife Conservation Strategy, a guiding conservation strategy document for western states. In addition, they recommended that any "plan amendments designate Areas of Critical Environmental Concern or otherwise to enhance and increase biological value, visual resource, or other important protections."

4.4 RELATIONSHIP OF THE SEIS TO OTHER FEDERAL POLICIES

Most comments focused on the need to meet the requirements of the enabling legislation for the NCA (Public Law 103-64). Some comments suggested that additional transmission lines are consistent with the law. One comment cited text in Manual 6220 that created the expectation that new transmission lines would not be permitted in an NCA.

The U.S. Environmental Protection Agency (EPA) noted requirements under the Clean Water Act (refer to Section 4.17 below), and the U.S. Army Corps of Engineers cited wetland mitigation requirements. The National Park Service (NPS) requested that the BLM coordinate on analyzing effects on the Oregon National Historic Trail remnants throughout western Idaho, particularly at

intact segments such as those in Hagerman Fossil Beds National Monument and in the vicinity of Three Island Crossing State Park, as well as on alternatives in the vicinity of Hagerman Fossil Beds National Monument.

4.5 OUT OF SCOPE COMMENTS

Two environmental organizations suggested that the Proponents focus on conservation measures with customers and development of a smart grid. A Melba organization requested being taken off of the Gateway West mailing list. In addition, one organization recommended a cost-benefit analysis be included in the NEPA process. An individual suggested that the all transmission lines be upgraded to 500 kV, recommended using existing rights-of-ways instead of private property, and switching a free market power grid. One environmental organization commented on the South Hills Important Bird Area, which is not crossed by either Segment 8 or 9.

4.6 SUPPORT FOR THE PROJECT AND/OR THE PROPOSED ACTION

This category received the largest number of comments. More than 150 comments expressed support for the Project and/or the proposed routes, noting that the Proponents had adopted the RAC recommended routes. Most comments noted the need to place the lines on public land where possible. Many comments noted that there were already several transmission lines in the NCA and these had not harmed raptors. However, many of these commenters, while supporting the proposed routes, questioned whether the Proponents' MEP was adequate. Several comments expressed disappointment that the Proponents had not adopted the RAC recommendations on the plan of development.

4.7 OPPOSITION TO THE PROJECT

Comments from several environmental organizations and individuals opposed the Project due to the Project's effects on wildlife, scenery, historic trails, and other resources. Many of these comments also mentioned the lack of adequate mitigation, both within the NCA and along the entire Project. One comment opposing the Project cited text in Manual 6220 that created the expectation that new transmission lines would not be permitted in an NCA.

Several comments questioned the need for additional transmission lines, and others were opposed to the Project crossing on or near their private land based on the concern that the project would reduce land values in the area. Visual impacts and health and safety concerns were also noted as issues.

4.8 GENERAL COMMENTS ON SEGMENTS 8 AND 9 AND ON OTHER ROUTES

Several comments generally stated agreement or approval of Segment 8 and/or Segment 9, but did not provide a specific rationale explaining their position on the project. Others had specific comments about particular portions of the new proposed Segments 8 and 9 and/or alternatives for Segments 8 and 9 that were part of the FEIS. These comments are summarized below. If a comment pertained to a specific resource or resource use, it is discussed also under that resource section in this report.

The EPA recommended consistent application of environmental protection measures on both federal and non-federal lands and requested that the SEIS provide updated concerning where the protection measures will apply and on the impacts associated. One commenter suggested using public lands to replace lost farm or private lands from siting of Segments 8 and 9, while another asked about farmers getting a fair price for their land if the line is sited across it.

A letter from two organizations commented that Segment 8 and 9 alternatives (likely referring to the alternatives analyzed in the FEIS) could degrade and fragment large areas of sagebrush ecosystems and other fragile lands. Another commented that greater sage-grouse Priority Habitat should be considered exclusion zones throughout the entire length of the Project. These organizations also raised concerns about impacts to Areas of Critical Environmental Concern. Other comments (including from environmental organizations) suggested that a wide range of routes and/or alternatives must be considered in this analysis. Some specifically recommended that all RAC options be considered in the analysis. Some organizations were concerned about routing Segments 8 and 9 on the NCA and conflicts with other federal policies.

The State of Idaho indicated that the new proposed routes are an improvement over the BLM's preferred alternative in the FEIS. The state supports co-locating Segments 8 and 9 with the existing transmission lines to minimize impacts on agriculture, historic properties, visual resources, and greater sage-grouse. The state also requested full analysis of impacts on several resources if any new alternatives are developed as a result of the SEIS scoping process, particularly any near the Bruneau Dunes State Park or State Endowment Lands and Public Trust Lands.

The NPS expressed concern about portions of the BLM Preferred Alternative from the FEIS in the vicinity of Hagerman Fossil Beds National Monument (see Section 4.16, Recreation). In addition, the NPS expressed concern over placement of Segment 9 between King Hill and the NCA, particularly in regard to the Oregon National Historic Trail. An historic trail organization expressed a concern about impacts to historic trails remnants along Segments 8 and 9 (see section on historic trails).

Many commenters were opposed to the lines being sited on private lands, with many preferring the new proposed Segments 8 and/or 9 over the FEIS Preferred Route for Segment 8. Some landowners were in favor of the avoiding the Kuna area and recommended placing the line south of the Swan Falls area. One landowner opposed Alternative 8C from the FEIS because there would be an additional power line across their land. Several commenters supported all or portions of routes considered in the FEIS to avoid having a new line on or near their property or to avoid impacts to the NCA.

One commenter suggested a new route for Segment 8 that would follow an existing line traveling northwest from Midpoint and following the existing line north of Gooding and King Hill then across federal land to south of Mayfield. Two commenters were opposed to Alternative 9E of the FEIS because of impacts on visual resources and greater sage-grouse, while another was in favor of 9E because it crosses more public land and has fewer impacts to private residences. One commenter specifically opposed any route through the Owyhee foothills and the towns of Oreana, Grandview, and Bruneau.

4.9 MITIGATION, ENHANCEMENT, AND MONITORING

The Idaho Farm Bureau requested that the BLM be directly involved in agreements with landowners regarding mitigation and compensation if impacts to private lands cannot be avoided. Some comments requested that all impacts to private lands be fully compensated for, through levels that are agreed to by the land owners. The NPS suggested that any proposed mitigation be commensurate to the level of project-related impacts on private as well as public lands. One comment suggested that mitigation and enhancement be conducted at the landscape level. Several comments suggested that all mitigation programs be implemented for the life of the Project. Multiple comments stated that the SEIS should demonstrate that the MEP creates a net benefit to the NCA before approval of the right-of-way through this area can be granted. The EPA requested that the SEIS disclose the structure and management of the In-

Lieu-Fee program that would be required to compensate for unavoidable aquatic impacts, as well as justify why an In-Lieu-Fee program would be appropriate mitigation for these impacts. One comment requested that a third-party monitor examine "all actions" taken by the Proponents, including mitigation, and that the Proponents provide some of the funding necessary for this third-party monitor.

Multiple comments stated that the mitigation currently proposed is not adequate to compensate for project-related impacts; including impacts to the resources and values of the NCA. Multiple comments requested that the MEP focus on enhancing raptor populations and habitats, and have less emphasis on non-raptor related issues (e.g., public education or law enforcement). These commenters further requested that the Proponents fully adopt the RAC recommendations regarding the MEP, and suggested that a monitoring and research component be added to the plan.

Owyhee County commented that it is county policy to retain all privately owned land in the tax base, rather than allow it to become public land. Some commenters questioned the applicability of land acquisition as a feasible mitigation option for this project, and requested that the BLM and the Proponents justify its use in the MEP. A few comments questioned the accuracy of the Proponents' claim that the restoration efforts proposed in MEP will have an 80 percent success rate in cheatgrass-dominated areas, and point out that this is in direct conflict with current science and on-the-ground experiences. One comment questioned the effectiveness of perch deterrents as a feasible mitigation option, whereas other commenters requested that the Project include the addition of new perching and nesting structures as mitigation.

One organization requested that the MEP include an effort by the Proponents to come to an agreement with landowners that would change agricultural practices in the area, ultimately resulting in restoration of disturbed private lands. The Golden Eagle Audubon Society made multiple recommendations for additional mitigation measures that they felt should be included in the MEP, such as a "shooting closure" near the transmission line, protection of remnant native habitats, establishment of a restoration fund managed by the Oversight Committee, and the establishment of vegetation monitoring goals and a monitoring plan. One commenter requested that the cost of habitat restoration in the NCA be based on the Habitat Equivalency Analysis found in the FEIS, and not the methods used in the Proponents' recent MEP.

4.10 LAND USE

Over a third of the comments in this category were against the lines being on private land. The general concern for private property was that land/home owners were concerned about visual impact, land-value depreciation, and loss of production land or development potential. Almost all of these commenters supported the routes through the NCA rather than the alternatives that traverse more private land. One comment stated that if private land was taken for the utility lines, public land should be opened up for development as compensation. Only one comment specifically stated that the route should not go through the NCA; citing raptors' and pilots' needs. The Idaho Farm Bureau commented that the County Planning and Zoning Commission is the entity authorized by state law to approve or reject these types of projects and encourages the BLM to honor state law and avoid legal challenges by coordinating with each county official.

Approximately a third of the comments in this category were regarding how the mandate of the NCA would be adhered to if these lines were allowed, including comments citing the legal requirement for the "protection, maintenance, and enhancement of raptor populations and habitats." A number of comments stated that the proposed mitigation was inadequate to offset degradation that would result from the Project and/or that statements made regarding potential impacts within the NCA were incorrect or misleading. A comment, submitted for the National

Audubon Society, Prairie Falcon Society, and Western Watersheds, stated that the ongoing threats to the NCA should be addressed because the proposed action would only increase these impacts and that amendments would "significantly downgrade protection for natural resources." Other comments challenged statements made regarding level of impact and needed mitigation, stating that the Proponents downplayed the impacts and provided an insufficient final mitigation package despite earlier comments.

A few comments were received regarding land-use conflicts for public land other than the NCA. One comment raised concerns about the impact the powerlines would have on Celebration Park, regarding changing the viewshed to an industrial landscape. Another comment specifically stated that the "BLM must fully analyze any impacts to Endowment Lands and Public Trust Lands, including beds of navigable lakes and streams." Another comment stated concerns for how the lines will traverse federal, state, and private lands and how potential conflicts with existing management plans will be addressed.

4.11 WILDLIFE, WILDLIFE HABITAT, AND VEGETATION

Most comments expressed support for the proposed route because they believed that other route options would have greater impacts to biological resources (including sage-grouse and their habitats, raptor species, pygmy rabbits, burrowing owls, slickspot peppergrass, mule deer, antelope, mountain sheep, and wild horses). The Idaho Department of Fish and Game also expressed support for the portions of Segments 8 and 9 that are co-located with existing infrastructure because these routes would minimize fragmentation of wildlife habitats. However, the State of Idaho emphasized the importance of analyzing any new biological information that has become available since the publication of the FEIS.

Many commenters expressed concern that the Project could impact wildlife and their habitats. Potential impacts that were raised in these comments include fragmentation of habitats, increased human access to previously inaccessible wildlife habitats, increased avian collision risks and subsequent mortality, increased predation of small animals by ravens and raptors, and the effects of noxious weeds and/or fire on wildlife habitats. However, other commenters suggested that the Project would be beneficial to raptor populations, due to the increase in new perching structures resulting from the towers. One commenter expressed concern that the project could impact the South Hills Important Bird Area (IBA); however, the IBA is not in the area crossed by Segments 8 and 9. Topics that commenters want included in the SEIS wildlife assessment include migration corridors, existing population stressors, and any new data and studies that have recently become available.

Multiple comments requested that the Proponents' MEP focus on enhancing raptor populations and habitats, and have less emphasis on non-raptor related issues (e.g., public education or law enforcement); these comments further requested that the Proponents fully adopt the RAC recommendations regarding the MEP, and suggested that a monitoring and research component be added to the plan. Some comments questioned the accuracy of the Proponents' claim that the restoration efforts proposed in MEP will have an 80 percent success rate in restoring native vegetation to cheatgrass-dominated areas, and point out that this is in direct conflict with current science and on-the-ground experiences. One comment questioned the effectiveness of perch deterrents as a feasible mitigation option. Other commenters requested that the Project include the addition of new perching and nesting structures (beyond the towers) as mitigation.

4.12 SCENERY AND VISUAL RESOURCES

Visual resource concerns within the NCA were raised by multiple commenters. Comments mentioned decreased visual values as a result of placing the Project within the NCA, while one comment specifically stated that amendments would result in degradation of the NCA resources. Two comments specifically supported routes going through the NCA, stating that these routes allow for minimization of visual impacts in the area.

There were some comments regarding visual impacts of the Project to historic trails. Two comments approved routing that minimized impacts to historic trails (from Glenns Ferry to Indian Springs, and routing north or east of the Snake River), while one comment specified desired methods for addressing trail crossings (cross in already degraded areas, do not put lines in pristine trail viewsheds).

The most frequently voiced concern regarding visual effects was views from private land and how the addition of the Project to these views would result in a depreciation of land value. Additionally, multiple comments were submitted regarding Alternative 9E from the FEIS and how it would have irreversible impacts on the pristine character of the Owyhee Front. These comments supported choosing a route that did not impact the Owyhee Front. There were also comments concerned with the effects of routing lines near public parks, specifically the Bruneau Sand Dunes (night sky viewing), Celebration Park, and Hagerman Fossil Beds. The NPS specifically stated support for the BLM alternative near Hagerman Fossil Beds National Monument and that if routes closer to this area are considered, there may be concerns related to visual resources, among other resource issues. One comment raised concerns over creating an industrial landscape viewable from Celebration Park, which is a well-used recreation area.

4.13 CULTURAL RESOURCES AND HISTORIC TRAILS

Most comments expressed support for the proposed route along Segments 8 and 9, and opposed other route options due to the possibility of increased impacts to cultural resources that could occur if the route crossed private lands. One commenter expressed support for the proposed route because it would avoid impacts to the "Historic Old Oregon Trail." Multiple comments requested that appropriate mitigation be applied to compensate for impacts to trails and cultural resources if impacts could not be otherwise avoided.

One commenter expressed concern that there might be Native American sites along Owyhee front in the Oreana area that have not been considered in previous analyses for this Project; while one comment requested that the SEIS provide a map of cultural resources that would be impacted by the Project.

One comment pointed out that the BLM needs to show that the selected route complies with the requirements of the enabling legislation for the NCA (Public Law 103-64), including the requirement to maintain cultural resources and values of the area. One commenter requested that the Project cross the Oregon and California National Historic Trails in areas that are already disturbed or where no trail remnant exists. The Idaho Chapter of Oregon-California Trail Association expressed support for the "Gateway West Programmatic Statement for historic preservation," the "Cultural Resources Protection Plan," and the off-site mitigation projects proposed by the Proponents to compensate for unavoidable impacts to historic and archeological resources. The NPS requested that the BLM continue to protect the visitor experience at the Oregon National Historic Trail, and that any proposed mitigation be commensurate to the Project's impacts. The NPS stated that the Oregon National Historic Trail could be impacted by the BLM Preferred Route from the FEIS as well as the currently proposed route for Segment 8. The NPS further requested the BLM provide them with a data layer for the

Project so that they could determine the location of the proposed crossing of the Oregon National Historic Trail along Segment 9.

4.14 SOCIOECOMOMIC ISSUES

Most comments expressed support for the proposed route along Segments 8 and 9, and opposed other route options due to the possibility of increased impacts to agricultural areas if the route crossed private lands. However, one commenter requested that the route not cross the Snake River Birds of Prey NCA or the National Guard's base, because they felt that potential impacts to the military base and the NCA would be greater than what would be experienced by the farming community on private lands. Some comments expressed concern that routing the Project through agricultural areas would prevent future developments of pivot agriculture in the area, while other commenters expressed concern regarding how the Project could affect future economic development and immigration into the area. The Idaho Farm Bureau requested that private properties be avoided to the extent possible, and that direct involvement and agreement with the landowner regarding the route and mitigation/compensation would be needed if impacts to private lands could not be avoided. The Idaho Farm Bureau further stated that the BLM should closely coordinate with each county's official elected representative regarding the Project's alignment, because they are the entity authorized by state law to provide the final alignment approval. Some comments requested that the SEIS assess the economic benefits and costs of routing the Project through the Snake River Birds of Prey NCA compared to a route that crossed private lands. One commenter requested that the cost of habitat restoration in the NCA be based on the HEA analysis found in the FEIS, and not the methods used in the Proponents' recent MEP. One commenter suggested that funds proposed in the MEP for education and land acquisition should instead be used for "more effective enhancement projects." However, one commenter suggested that the Project could have positive impacts on economic growth in the area, due to increased access to reliable power. Multiple comments expressed concern that the Project would adversely affect adjacent property values.

4.15 AGRICULTURE

Most of the comments focused on concerns that routing the Project through agricultural areas would adversely affect farming practices. Potential impacts raised by commenters included: the possibility that the line would prevent future developments of pivot agriculture, potential adverse effects that the Project's electric and magnetic field (EMF) could have on sensitive farm and dairy equipment, and the potential effects of the EMF on cattle health and production. One commenter described the effects that a transmission line EMF had on his farm in California, which included a reduction in the milk production of his cattle.

4.16 RECREATION

The State of Idaho requested full analysis of impacts on wildlife recreation activities that were not previously analyzed during the FEIS process. The state also requested analysis of all recreational opportunities, including night sky viewing, if any alternatives are routed near the Bruneau Dunes State Park. One commenter was concerned about a second transmission line in close proximity to Celebration Park, particularly because of frequent park visitation by large groups. Another individual indicated that Celebration Park and Guffey Bridge do not appear to have many impacts. A local Kuna individual expressed concern about a transmission line interrupting various recreation opportunities on BLM land south of Kuna, such as hiking, cross country running, biking, four-wheeling.

The NPS recommends the BLM Preferred Alternatives in the vicinity of Hagerman Fossil Beds National Monument (the Monument). Other routes could impact visual resources and visitor access during construction and cause increased vandalism and theft of resources from off-highway vehicles (OHV) and horseback use on new access roads. If new alternatives are developed in proximity to the Monument, NPS requests early interagency coordination. NPS is also concerned about protecting the visitor experience at Oregon National Historic Trail remnants, particularly in the Monument, in vicinity of Three Island Crossing State Park, and other public and private lands.

Several organizations pointed out that new roads and increased access by the public will degrade areas that were not previously as accessible. These organizations shared current scientific literature to be utilized when developing alternatives and minimizing harm to recreational uses. One commenter pointed out that increased public access on the NCA will increase vandalism, weed spread, litter, and recreational shooting. The commenter requested either the BLM close the roads to recreational shooting or the Proponents fund studies of the effects of recreational shooting, including lead, on raptor and prey populations.

4.17 WATER RESOURCES AND USE

The EPA requested that the EIS disclose the structure and management of the In-Lieu-Fee program that would be required to compensate for unavoidable aquatic impacts, as well as why an In-Lieu-Fee program would be appropriate mitigation for these impacts. One comment recommended that the SEIS analyses the impacts that the Project would have on Endowment Lands and Public Trust Lands, including navigable waters. Some comments voiced the public's concern regarding the potential impacts to water resources along Segment 8, from MP 126 to the Hemingway Substation.

4.18 AIR QUALITY AND GREENHOUSE GAS

One comment was received concerning air quality. The Prairie Falcon Association and Western Watersheds Project stated that they would like an analysis of the Project's effects on climate change in the Draft SEIS; assessing any "adverse impacts that may result from Gateway and degradation and risks it poses."

4.19 TRANSPORTATION

Multiple comments mentioned the potential impacts that increased access (as a result of new road building) would have on the NCA, including weed spread, vandalism, litter, and recreational use. Comments raised concerns over additional impacts to the NCA, including the risk of raptor electrocutions, damage to slickspot peppergrass, increased weed infestations, and increased fire risk. One comment requested questioned how the alternatives correspond to the latest BLM Idaho Infrastructure map.

Other comments supported the proposed placement of the lines in the NCA because it contains an existing infrastructure and minimizes new road construction. One comment noted that this route would be easier to build because it avoids some canyon traverses and roadways, and maintenance and upkeep would be easier than other alternatives. One comment suggested conducting a study evaluating the cost savings of using the existing roads on these new routes and adjusting the enhancement package accordingly.

There were several comments regarding effects of the line in areas other than the NCA. The NPS commented that if the route near the Hagerman Fossil Beds National Monument was moved closer to the Monument, increased access could pose vandalism, theft, and OHV risks to

the area. One comment expressed a concern that the proposed route would impact development plans, such as airport construction because the line placement would make taking off and landing impossible.

4.20 GEOLOGIC HAZARDS, SAFETY, AND ELECTRICAL ENVIRONMENT

Some comments expressed concerned about health, safety, and noise issues for people living close to high-voltage transmission lines, particularly in areas where transmission lines already exist. Several organizations were concerned that that the Project would increase fire danger, particularly from new roads and increased access to the area and from raptor electrocutions that fall to the ground. One commenter pointed to easier construction and maintenance of the Project, including tower installation and road building, in areas with fewer canyons and undulating terrain. Another commenter cautioned of potential safety issues from the line and proximity to the Murphy Airport.

Dairy operators expressed concerns about impacts to dairy operations including milk quality, reduction in milk production, dairy cow behavior, feeding, and conception rates. One dairy operator was worried about having to monitor these concerns and the sensitive milk barn equipment and electronics that could be affected from the transmission lines. Others were concerned that the Project would interfere with radio and television reception and transmission. One comment questioned the long-term effects of power lines on raptors.

4.21 EFFECTS ON THE STATE AND COUNTIES

Two comments mentioned the cooperation between federal, state, and local officials and groups in designing these alternatives and stated that there is no reason to choose any other route and to keep the lines in the NCA. One comment stated that impacts to State Endowment Lands and Public Trust Lands (including navigable lakes and streams) should be fully analyzed. One comment addressed the purchase of private lands to mitigate impacts to cultural resources, stating that this would be contrary to county goals of keeping current acreage in private ownership (citing effects to the tax base). One commenter mentioned use of the BLM land south of Kuna, and how this area is highly used and the lines should be moved to an area with less community use.

4.22 CUMULATIVE EFFECTS

Comments requested the SEIS address cumulative impacts of multiple power lines, energy developments and other disturbances on native vegetation and greater sage-grouse migration and movement.

APPENDIX A
ISSUES IDENTIFIED IN THE 2009 SCOPING PROCESS

Socioeconomics

Is there sufficient housing available for temporary and permanent workers?

Would the temporary workforce have detrimental effects on existing services in local municipalities?

What would be the effects on population numbers?

What would be the effects on economic conditions?

Would education or schools be affected?

Would public services such as police or fire protection be impacted?

How would the Project affect tax income to local governments?

How would development of the Project impact municipal infrastructure and other planned development?

How would the presence of the transmission line affect the quality of life of and enjoyment of the land by local residents?

What would be the economic impacts to individuals?

How would this Project affect tourism and recreation?

Would construction or operations of the Project disrupt delivery of any public utilities such as electricity or sewer?

What municipalities and other population concentrations would be impacted?

Under what circumstances would private land be condemned, and what would the effects of this be?

Environmental Justice

What would be the effects on minority populations or communities?

What would be the effects on low income populations or communities?

What would be the effects on Tribes?

Vegetation Communities

How much vegetation would be cleared, and how much would be kept clear or otherwise maintained during operations?

How quickly would the various vegetation communities that are cleared for construction but allowed to regrow during operations recover from disturbance?

How much disturbance would occur in sagebrush communities and what would be the effects?

How much disturbance would occur in native grasslands and what would be the effects?

Would old-growth forest stands be affected, and what measures would be taken to protect this vegetation type?

What would be the effects of construction, operations, and maintenance on fire occurrence, frequency, and severity; especially as they relate to important shrub-steppe and forest habitats?

Special Status Plants

What would be the effects to endangered and threatened species, both individuals and populations?

What would be the effects from changes in habitat for TES plants?

What effect would the potential spread of noxious weeds have on special status plants?

Would hydrology be altered in occupied habitat for TES species associated with wetlands and what effect would the alteration have on those species?

Invasive Plant Species

Would noxious weeds be introduced or spread into the ROW and adjacent areas?

How would the presence of the Project impact efforts to control existing noxious weeds?

Would a noxious weed prevention and abatement plan be developed in conjunction with the appropriate agencies?

Wetlands

What would be the effects on permanent and seasonal wetlands?

Would riparian areas be affected?

Can equipment staging and/or refueling areas be kept away from wetlands and riparian areas?

General Wildlife and Fish

What would the effects of Project construction and operations be on general, non-special-status wildlife, including birds, reptiles and amphibians, and large and small mammals?

When routing the Project, would key wildlife habitats be avoided?

What would the effects be on migratory bird species?

Would there be a loss or fragmentation of wildlife habitat, especially for sagebrush-obligate and forest-dependent species?

What wildlife mortality would occur during construction?

Would there be a potential for disruption of breeding and reproductive activities of raptors?

What would be the effects on big game migration?

What would be the effects on big game and crucial big game winter range—habitat removal and disturbance during seasonal occupancy?

What would be the effects on big game parturition areas from habitat removal and disturbance during seasonal occupancy?

What would be the potential for avian collision during operations and what measures would be taken to minimize this risk?

Would noise created during transmission line operations affect wildlife?

What best management practices would be used during construction and operations to protect fish resources?

How would disturbed instream habitats be protected and restored?

What would be the potential for electrocution of large birds during operations?

What would be the impacts on wildlife or wildlife habitat within an NWR, State Park, State Wildlife Management Area, or Special Management Area on federal lands specifically managed for one or more species of wildlife?

Special Status Wildlife and Fish Species

What would be the effects of Project activities on species federally listed as threatened, endangered, candidate, or proposed?

How would Project construction and operations affect predation on sage-grouse and sharp-tailed grouse, and how would these risks be minimized?

How would the Project affect sage-grouse and sharp-tailed grouse habitat?

Would the Project comply with sage-grouse and sharp-tailed grouse Conservation Plans?

What agencies and conservation groups would be consulted?

What would be the impacts on nesting and wintering eagles and their habitat?

What would be the effects on species listed as sensitive by the BLM? Specifically, what would be the impacts to greater sage-grouse breeding and brood rearing areas and where would these impacts occur?

What would be the effects on species listed as sensitive by the Forest Service?

Minerals

Paleontological Resources

Would a full inventory of potentially affected paleontological resources be carried out?

Would fossils be damaged during construction?

Would fossils be removed or destroyed by increased access to protected areas?

Geologic Hazards

Would a full inventory of potentially affected geological resources be carried out?

What would be the potential for earthquakes to damage the transmission line and associated structures?

What effect would subsidence from underground mining have on the transmission line, and what would be the hazard to workers or infrastructure?

What effect would landslides have on the transmission line?

What effect would construction blasting in shallow bedrock have on unstable landforms (landslide-prone areas) or on adjacent man-made structures not related to the transmission line?

Soils

What would be the effect on soil erosion, and the potential for increased soil erosion from Project construction, operations, and decommissioning?

What would be the effect on Project soils from compaction by vehicle and equipment traffic?

What effect would topsoil disturbance have on soil productivity after construction and reclamation?

Water Resources

What would be the impacts to water quality from roads and other causes of erosion?

Would state water quality standards be met?

Which pollutants could enter waterbodies and what would be the impacts from them?

What would be the impacts on drinking water, wells, and springs?

Would municipal water service to individual properties be affected?

What would be the handling procedures for hazardous materials near waterbodies and wells?

Would water be drawn from surface waterbodies, and what would the effects of that be?

What storm water permits would be required, and would their stipulations be met?

Would there be any impacts on water rights?

What would be the impacts from sedimentation and temperature increases in sediment and temperature-impaired water bodies?

Would groundwater be affected?

Land Use and Recreation

How would the project affect concentrated animal feeding operations (CAFO)?

How would the project affect current agricultural systems, including pivot irrigation and advanced positioning systems used in farm equipment?

What residential areas, planned development, and specially designated uses would be affected?

How would the Project affect specially designated areas including NWRs, National Parks, National Monuments, Special Management Areas, and recreation sites, and roadless areas?

How would the transmission line affect timber and fire management activities?

To what extent would the Project be co-located with existing developments?

Would hunting or fishing be affected?

Would there be any losses of recreational opportunities?

Would the Project adhere to local land use plans and policies?

Would the Project impact any military activities?

How would construction of this transmission line influence the installation of more developments and projects in the same area in the future?

Would construction buffers around buildings be maintained?

What permits and plan amendments would be required for this project?

What would be the plan for re-entries and maintenance activities on private land which would continue for decades into the future?

Agriculture

How much agricultural land would be impacted, and what would the effects be?

What would be the effects on livestock grazing of construction and operations of the transmission line?

Would there be a loss of prime farmland?

What would be the impacts to agricultural production including equipment operation and aerial spraying?

Would there be a disruption to dairy operations and other types of CAFOs?

How would the transmission line interfere with crop dusting?

Would the transmission line cause electronic interference with agricultural equipment?

Transportation

Would a full map and inventory of all new temporary and permanent access roads for the Project be developed?

How would vehicles taking materials and personnel to and from the Project site affect traffic patterns?

How would roads, highways, railroads, and airports be affected?

Would there be an increase in off-highway vehicle use, and what would be the environmental impacts of this?

Would construction and operations of the Project cut off access to any previously-accessible areas?

- How would roads affect livestock and grazing operations?
- What would be the environmental effects of new temporary and permanent roads constructed for this Project?

Air Quality

Would the proposed Project be inconsistent with the applicable air quality plans?

What would be the effects on human health of any increase in airborne pollutants caused by the Project?

Would the proposed Project generate emissions of air pollutants that would exceed established thresholds, or cause adverse impacts on air quality?

Would the proposed Project cause or contribute to any violation of any state or federal ambient air quality standards?

Would the proposed Project expose sensitive receptors to substantial pollutant concentrations?

What would be the methods used to control dust?

What would be the steps taken to minimize air quality impacts?

How much greenhouse gas emissions would be associated with this project, and what would be the effect of the Project on climate change?

Electrical Environment

Would voltage on the conductors of the transmission lines build up, for example in large vehicles or pivot irrigation systems, and produce nuisance shocks, or lead to fuel ignition?

Would electric and magnetic fields (EMF) associated with transmission lines cause health effects?

Would the audible noise during operations be loud enough to be annoying or interfere with normal communication?

Would stray voltage be a concern in the context of animal care where unwanted voltage on feeders, watering stations, or equipment such as milking machines, can lead to reduced food or water intake.

Would services such as Global Positioning System (GPS) receivers, satellite dish receivers, cell phones, AM/FM (amplitude modulation/frequency modulation) radio, two-way radio communication, television, and internet be disrupted?

Public Safety

Would the Project cause environmental contamination or expose workers or the public to contamination?

What would be the effects of electric and magnetic fields?

Would the transmission line withstand wind and ice storms?

Would the transmission line cause fires or create a fire hazard?

Would workers or the public be safe from electrocution?

What would be the effects of the transmission line on human health?

What would the Proponents do to prevent the dangers of downed lines and tower failure?

How would the Proponents protect against potential vandalism or acts of terrorism to Project structures?

Would electrical safety procedures be followed?

Noise

Would people be exposed to noise levels in excess of standards established by existing regulations, ordinances, and standards?

Would there be a substantial temporary or permanent increase in ambient noise levels in the Project vicinity above levels existing prior to Project construction and operation?

Would people be exposed to ground-borne vibration or ground-borne noise levels?

APPENDIX B
COMMENT CODES AND TABLE

Appendix B-1
Codes Developed for the SEIS Scoping Report

Gateway West Segments 8 and 9 Scoping Comment Categories
Updated 11/12/2014 – DRAFT

Code	Subject	Notes
10000	Conformance with the NEPA process	Includes comments on the need for a new EIS vs. SEIS and what an SEIS should consider
10010	Out of scope comments	
11000	Purpose and Need for the Project	
12000	Relationships to other federal laws and policies	Specific comments on land management plans/plan amendments go under 34030
13000	Use of/ Failure to use designated corridors	RMP corridors in NCA or WWEC
14000	Proposed Action	Includes revised routes and MEP
15000	Comparison of Alternatives	
16000	Generally support project	Specific comments on proposed route go under Segment Reference (50000 series)
17000	Generally oppose project	Specific comments on proposed route go under Segment Reference (50000 series)
18000	Comments on segments 1 to 7 & 10	These are out of scope but we need to track them separately
19000	Mitigation (general)	See 35000 if mitigation specific to the MEP or NCA
20000	Monitoring	
21000	Tribal Consultation/ Treaty Rights and Resources	
22000	General Environmental Resources	Use visual if unsure between visual/historic trails
23000	Visual Resources	
24000	Cultural Resources	
24010	Historic Trails	
25000	Socioeconomics	Tourism
25010	Employment	
25020	Housing	Includes constraints during construction and shortage
25030	Property Values	
25040	Taxes/Taxpayers	
25050	Community/city development and expansion	Includes economic effects on new subdivisions and facilities (also see 34020)
25060	Agriculture	Economic effects on farming, including irrigation systems (technical impacts due to tower and line placement are under 37000)
26000	Environmental Justice	Includes minority and disadvantaged communities
27000	Vegetation	
27010	Special Status Plants	Mostly comments on slickspot peppergrass
27020	Invasive Plants/weeds	

Code	Subject	Notes
27030	Wetlands / Riparian vegetation	
27040	Native vegetation	Includes restoring sagebrush and native grasses
28000	Wildlife (general)	
28010	Habitat Fragmentation	
28020	Raptors/Eagles/Ravens	
28030	Big Game/Winter Range	
28040	Migratory Birds	
28050	Fish	
28060	Other Special Status Wildlife	
28070	Sage-grouse	
28080	Threatened / Endangered Species	Includes T&E, ESA, TES, listed species, candidate species, proposed species
29000	Minerals/Mining	
30000	Paleontology	fossils
31000	Geologic Hazards	Includes risks from earthquakes, landslides, unstable areas
32000	Soils	Includes erosion, compaction, loss of fertility
33000	Water Resources and Use	
34000	Land Use	
34010	Private Land/Land Ownership	General comments
34011	Site the line on public land	Avoid private land
34012	Site the line on private land	Avoid public land/avoid the NCA
34020	County and City Plans/Zoning	Municipal Impact Areas
34030	Federal land Use Plans/	Includes Plan Amendments
34040	Wilderness/Wild and Scenic Rivers	
35000	NCA/SRBOP (general)	
35010	Enhancement requirements	General comments
35020	Mitigation suggestions	General
35030	Applicants' MEP (specific to NCA)	
35040	Recommendations for MEP changes	Includes applying MEP to areas outside NCA
36000	Recreation	
36010	Trails	Other that historic trail issues
36020	Off Road Vehicles/OHV	Includes comments on non-motorized areas
37000	Agriculture (includes crop production, dairies, cattle feedlots, and grazing)	Technical issues such as interference with pivot irrigation
38000	Transportation	Includes impacts to traffic, new road construction
39000	Air Quality	

Code	Subject	Notes
40000	Electrical Environment	Includes electric magnetic interference (EMI) and electromagnetic fields (EMFs)
41000	Public Safety	Specific comments on health risks from transmission lines/EMFs, construction accidents
42000	Noise	
43000	Cumulative Effects	
44000	Consultation	
45000	Literature Used/Not Used	
46000	Refers to Previously Submitted Comments	
47000	Plan of Development (POD)	Either the revised POD or the 2013 POD (comments on Companies' MEP go under 35030)
48000	Design Features	Use this for any suggestions on double circuiting, separation distance, tower type, placing the line underground, etc.
Geographic/Segment Reference		
50000	Segment 8 – General	
50010	Segment 8 – Applicants' Proposed Route	
50020	Segment 8 – Routes considered in the 2013 FEIS	
50030	Segment 8 – RAC Route Options	
51000	Segment 9 – General	
51010	Segment 9 – Applicants' Proposed Route	
51020	Segment 9 – Routes considered in the 2013 FEIS	
51030	Segment 9 – RAC Route Options	
57000	General project effects on Counties	
58000	General project effects on State (Idaho)	

Appendix B-2
Comment Table

Letter #	Comment #	Signatures	Letter owners	Group	Coding status	comment	category
101396	1	1	MICHAEL KERSHNER	I = Individual (s) not affiliated	QC complete	I would suggest that the options that run south of Melba are the best fit for all involved.	50010 - Segment 8 – Applicants' Proposed Route, 51010 - Segment 9 – Applicants' Proposed Route
101401	1	1	JAMES AND MARY FREELAND	I = Individual (s) not affiliated	QC complete	The newest rout options for area 8 close to the existing power lines in the birds of pray area is Ok. Power lines should not run across the Melba valley area north or south.	50010 - Segment 8 – Applicants' Proposed Route
101397	1	1	ARLENE TRIPLETT	I = Individual (s) not affiliated	QC complete	There is no need to look at any other route and I approve the proposed Segment 8 route that the Regional Advisory Com (RAC) has proposed. Please do not change the route from the NCA.	50010 - Segment 8 – Applicants' Proposed Route
101395	1	1	SIDNEY SWAILS	I = Individual (s) not affiliated	QC complete	I approve The Segment 8 Route That the RAC has proposed. The NAC approved this and I see no other resone to spend any more money on this this has been the best possible route that has been vetted.	50010 - Segment 8 – Applicants' Proposed Route
101394	1	1	PATTI CAMERON	I = Individual (s) not affiliated	QC complete	we are happy to endorse Segment 8 &9, Idaho Power & Rocky Mt proposed route. Section 8 - Summer Lake option one Section 9 - Baja RD - Murphy Flats South. We oppose all other options, due to impacts on private land, such as ours, agricultural, economy sage grouse & sage grouse habitat. The tower infra structure are already in place, in the Birds of Prey what a great place for Gateway West Transmission Line!	25000 - Socioeconomics, 25060 - Agriculture, 28070 - Sage-grouse, 34010 - Private Land/Land Ownership, 50010 - Segment 8 – Applicants' Proposed Route, 51010 - Segment 9 – Applicants' Proposed Route, 48000 - Design Features
101392	1	2	US FISH AND WILDLIFE SERVICE, WYOMING ECOLOGICAL SERVICES,US FISH AND WILDLIFE SERVICE, IDAHO FISH AND WILDLIFE OFFICE,MICHAEL CARRIER	G = Government	QC complete	The Idaho Fish and Wildlife Office (IFWO) supports updated alternatives for Segments 8 and 9 that co-locate proposed new facilities with existing transmission lines to minimize fragmentation of habitats, including sagebrush steppe habitat. In addition, we encourage the Bureau and Project proponents to continue to work collaboratively with others to ensure that the final plan for updated Segments 8 and 9 provides meaningful and sufficient mitigation of impacts as well as net benefits to wildlife, native plants, and their habitats. The IFWO is available to provide technical assistance in the mitigation planning process for this Project as it pertains to our agency's trust resources.	19000 - Mitigation (general), 27040 - Native vegetation, 28000 - Wildlife (general), 28010 - Habitat Fragmentation, 50010 - Segment 8 – Applicants' Proposed Route, 51010 - Segment 9 – Applicants' Proposed Route, 48000 - Design Features
101392	2	2	US FISH AND WILDLIFE SERVICE, WYOMING ECOLOGICAL SERVICES,US FISH AND WILDLIFE SERVICE, IDAHO FISH AND WILDLIFE OFFICE,MICHAEL CARRIER	G = Government	QC complete	The IFWO is in the process of scheduling a meeting with the Bureau's Idaho State Office natural resources staff to discuss any additional Endangered Species Act section 7 needs for the updated Segment 8 and 9 transmission line routes. We also will discuss the updated proposed locations of the transmission line segments in relation to existing wildlife projects. As additional details about the updated transmission line routes become available, we will provide more detailed input to the Bureau.	27010 - Special Status Plants, 28080 - Threatened/Endangered Species
101375	1	1	JOSEPH AMOS JR	I = Individual (s) not affiliated	QC complete	I approve the segment 8 route. Please do not change the route from the NCA	50010 - Segment 8 – Applicants' Proposed Route
101377	1	2	KENNETH BLEVINS,NORMA HUTCHINS BLEVINS	I = Individual (s) not affiliated	QC complete	8 or 9 route is O.K. with us	50000 - Segment 8 General, 51000 - Segment 9 – General
101379	1	1	GEORGE KARAGIANES	I = Individual (s) not affiliated	QC complete	I prefer the proposed route. I approve it because it is further from the land I own. It is 1,200 acres in Black Creek Area. The deffered decision is much to close to my property.	34010 - Private Land/Land Ownership, 50010 - Segment 8 – Applicants' Proposed Route, 51010 - Segment 9 – Applicants' Proposed Route
101372	2	1	IDAHO FARM BUREAU FEDERATION,FRANK PRIESTLEY	S = Special Interest Group	QC complete	The Idaho Farm Bureau is encouraging you to place this line as much as possible on BLM lands and only to the extent absolutely necessary on private property. It only makes sense to avoid impact that would be caused to tillable or irrigated agricultural operations. If private production lands are deemed to be the only option possible, then involvement and agreement with landowners must conducted to minimize the impact to farming activities. Obviously, reasonable compensation for land values and mitigation of impact to private property must be guaranteed.	19000 - Mitigation (general), 25060 - Agriculture, 34010 - Private Land/Land Ownership, 34011 - Site the line on public land
101372	3	1	IDAHO FARM BUREAU FEDERATION,FRANK PRIESTLEY	S = Special Interest Group	QC complete	We support the Regional Advisory Commission recommendation and the proposed routes developed through the Snake River Birds of Prey (SRBOP) for both Segments 8 and 9. These routes have the lease impact on the least number of people, resources, agriculture, residences, wildlife, scenic and cultural values.	23000 - Visual Resources, 24000 - Cultural Resources, 25020 - Housing, 28000 - Wildlife (general), 50010 - Segment 8 – Applicants' Proposed Route, 51010 - Segment 9 – Applicants' Proposed Route

Letter #	Comment #	Signatures	Letter owners	Group	Coding status	comment	category
101372	4	1	IDAHO FARM BUREAU FEDERATION,FRANK PRIESTLEY	S = Special Interest Group	QC complete	The Idaho Farm Bureau supports and believes that County Planning and Zoning Commissions under the authority of respective County Commissions is the entity authorized by state law to provide the final alignment approval and is authorized to permit or reject construction projects of this nature. We encourage the BIM to honor and follow the provisions of Idaho state law. To avoid legal and (Cont'd . . .) jurisdictional problems we encourage your close coordination with each county's officials elected to represent their citizens on this important and expansive project. It is our position that this will be beneficial for the development of an appropriate alignment, minimize legal challenges and ultimately reduce the costs that will ultimately be passed on to the utility customers.	25000 - Socioeconomics, 34020 - County and City Plans/Zoning
101372	1	1	IDAHO FARM BUREAU FEDERATION,FRANK PRIESTLEY	S = Special Interest Group	QC complete	Many of our members live in close proximity to the proposed segments 8 and 9 and have concern regarding the impact to their agricultural property and property values from the alignment of this transmission line.	25030 - Property Values
101374	1	1	LYNN HEINER	I = Individual (s) not affiliated	QC complete	Please do not change the route from the NCA.	50010 - Segment 8 – Applicants' Proposed Route, 51010 - Segment 9 – Applicants' Proposed Route
101382	1	0	ANONYMOUS	I = Individual (s) not affiliated	QC complete	Please do not change the route from the NCA	50010 - Segment 8 – Applicants' Proposed Route, 51010 - Segment 9 – Applicants' Proposed Route
101340	1	1	KRIS KALANGES	I = Individual (s) not affiliated	QC complete	I strongly urge you to approve the Original Se. 8 route that would NOT go through the Morley Birds of Prey NCA nor the National Guard Range. The farmers don't need protections. The Birds of Prey The military pilots do need to have the towers & power lines kept out of the respective areas.	25060 - Agriculture, 28020 - Raptors/Eagles/Ravens, 35000 - NCA/SRBOP (general), 50020 - Segment 8 – Routes considered in the 2013 FEIS
101338	1	1	STATE OF IDAHO, OFFICE OF ENERGY RESOURCES,JOHN CHATBURN,SCOTT PUGRUD	G = Government	QC complete	The OER supports the Proponents' Proposed and RAC recommended route for Segment 8 of the Project. This route beneficially co-locates with existing transmission infrastructure in the SRBOP-CA, which minimizes impacts on the SRBOP-NCA. Additionally, this is an improvement over BLM's preferred alternative in the Final Environmental Impact Statement (FEIS).	16000 - Generally support project, 35000 - NCA/SRBOP (general), 50010 - Segment 8 – Applicants' Proposed Route, 50020 - Segment 8 – Routes considered in the 2013 FEIS
101338	2	1	STATE OF IDAHO, OFFICE OF ENERGY RESOURCES,JOHN CHATBURN,SCOTT PUGRUD	G = Government	QC complete	The Proponent Proposed Route for Segment 8 minimizes impacts to agricultural operations, existing residences, future residential development, and economic impacts to the cities of Kuna and Melba.	25000 - Socioeconomics, 25050 - Community/city development and expansion, 25060 - Agriculture, 34010 - Private Land/Land Ownership, 34020 - County and City Plans/Zoning
101338	3	1	STATE OF IDAHO, OFFICE OF ENERGY RESOURCES,JOHN CHATBURN,SCOTT PUGRUD	G = Government	QC complete	The OER also supports the Proponents' Proposed and RAC recommended route for Segment 9 of the Project. This route will minimize impacts on the SRBOP-NCA by utilizing the same transmission towers to accommodate the existing 138 kV and the new 500 kV lines in a double-circuit configuration. Because this route will be built along the existing right-of-way adjacent to Big Baja Road, there will be no need to create new roads, which will also minimize impacts. The Proponents' Proposed route improves on BLM's preferred alternative in the FEIS because it minimizes impacts on agriculture, historic properties, and moves the linear infrastructure development out of the largely untouched, green-field landscapes of the Owyhee Front. Additionally, this route avoids Greater Sage-Grouse habitat, and was unanimously accepted by stakeholders including the Owyhee County Task Force and the Owyhee County Commissioners.	23000 - Visual Resources, 24000 - Cultural Resources, 25060 - Agriculture, 28070 - Sage-grouse, 35000 - NCA/SRBOP (general), 38000 - Transportation, 51010 - Segment 9 – Applicants' Proposed Route, 51020 - Segment 9 – Routes considered in the 2013 FEIS, 48000 - Design Features
101338	4	1	STATE OF IDAHO, OFFICE OF ENERGY RESOURCES,JOHN CHATBURN,SCOTT PUGRUD	G = Government	QC complete	The OER and the State of Idaho believe that any analysis that BLM does should not be duplicative of the work done in the FEIS and must be limited to new routes developed in the Scoping process.	10000 - Conformance with the NEPA process
101338	5	1	STATE OF IDAHO, OFFICE OF ENERGY RESOURCES,JOHN CHATBURN,SCOTT PUGRUD	G = Government	QC complete	BLM must fully analyze any impacts on fish and wildlife, including wildlife recreation activities, that have not previously been analyzed in the FEIS or any other environmental analysis that has been done in association with this project.	28000 - Wildlife (general), 28050 - Fish, 36000 - Recreation

Letter #	Comment #	Signatures	Letter owners	Group	Coding status	comment	category
101338	6	1	STATE OF IDAHO, OFFICE OF ENERGY RESOURCES,JOHN CHATBURN,SCOTT PUGRUD	G = Government	QC complete	If BLM, through the scoping process, develops alternative routes near the Bruneau Dunes State Park, the routes must be analyzed for their impacts on all of the recreational opportunities offered by the park including viewing the night sky from the Observatory.	23000 - Visual Resources, 36000 - Recreation, 51000 - Segment 9 – General
101338	7	1	STATE OF IDAHO, OFFICE OF ENERGY RESOURCES,JOHN CHATBURN,SCOTT PUGRUD	G = Government	QC complete	BLM must fully analyze any impacts to Endowment Lands and Public Trust Lands, including beds of navigable lakes and streams, which might occur from new routes developed during the scoping process for the SEIS.	27030 - Wetlands/Riparian vegetation, 33000 - Water Resources and Use, 34000 - Land Use, 50000 - Segment 8 General, 51000 - Segment 9 – General, 58000 - General project effects on State (Idaho)
101383	1	1	DON HEIDA DAIRY,DONALD HEIDA	B = Business or Business Group	QC complete	Please do not change the route from the NCA. I approve the proposed segment 8 route that the RAC has proposed.	50010 - Segment 8 – Applicants' Proposed Route
101384	1	1	CHET LEONARD	I = Individual (s) not affiliated	QC complete	Please allow power poles etc. to be located on BLM land and not our private owned lands.	34010 - Private Land/Land Ownership, 34011 - Site the line on public land
101385	1	1	TIFFINEE LEONARD	I = Individual (s) not affiliated	QC complete	I wish to keep the power lines off our private lands here in Oreana Idaho.	34010 - Private Land/Land Ownership
101386	1	1	CRAIG MOORE	I = Individual (s) not affiliated	QC complete	The BLM and Citizens of Idaho and especially affected Citizens as well as the BLM's RAC advisory committee and sub committee, have worked diligently for years to assist in the establishment of fair and efficient routing for Segments 8 and 9 Gateway West transmission lines. Now that most have agreed to route the lines through The NCA Birds of Prey on Public Lands where possible there is no reason to re-study all or some of previously studied routes that were considered and deemed impractical for many reasons including un-necessary disruption of agricultural lands, as well as near towns, homes and other uses.	25020 - Housing, 25050 - Community/city development and expansion, 25060 - Agriculture, 50010 - Segment 8 – Applicants' Proposed Route, 51010 - Segment 9 – Applicants' Proposed Route
101387	1	1	MATTHEW W DUCKETT	B = Business or Business Group	QC complete	I approve of the proposed Segment 8 route that RAC has approved. The RAC has spent hundreds of hours and thousands of dollars in reviewing various routes and concluded on the proposed route through the NCA. Please do not change the route from the NCA.	50010 - Segment 8 – Applicants' Proposed Route
101388	1	1	LINDSEY FUQUAY	I = Individual (s) not affiliated	QC complete	I endorse the two routes sited in SRBOPNCA only. I oppose all other routes due to impacts on private, and ag lands and the sage grouse	25060 - Agriculture, 28070 - Sage-grouse, 34010 - Private Land/Land Ownership, 50010 - Segment 8 – Applicants' Proposed Route, 51010 - Segment 9 – Applicants' Proposed Route
101389	1	1	BARBARA M CARROLL	I = Individual (s) not affiliated	QC complete	Please do not change the route from the NCA. I strongly approve the proposed Segment 8 route that the Regional Advisory Committee (RAC) has proposed. There is no need to spend more money looking for other routes. Pease protect our beautiful, productive farmland.	25060 - Agriculture, 50010 - Segment 8 – Applicants' Proposed Route
101390	1	1	MIKE CHEN	I = Individual (s) not affiliated	QC complete	Please do not destroy our beautiful and productive farm land. Running high voltage power line over thousands of private land and destroying productive farms is making no sense. Utilizing the exist route proposed by RAC that run through the NCA is the only logical solution. Please Do Not Change the route from the NCA	25060 - Agriculture, 34010 - Private Land/Land Ownership, 50010 - Segment 8 – Applicants' Proposed Route, 51010 - Segment 9 – Applicants' Proposed Route
101380	1	2	NATIONAL AUDUBON SOCIETY-PRAIRIE FALCON SOCIETY,WESTERN WATERSHEDS,KATIE FITE,JULIE RANDELL	S = Special Interest Group	QC complete	It appears that alternatives in segments 8 and 9 will have dramatic impacts that could further alter, degrade and fragment large areas of sagebrush ecosystems as well as other fragile lands.	28010 - Habitat Fragmentation, 50000 - Segment 8 General, 51000 - Segment 9 – General
101380	2	2	NATIONAL AUDUBON SOCIETY-PRAIRIE FALCON SOCIETY,WESTERN WATERSHEDS,KATIE FITE,JULIE RANDELL	S = Special Interest Group	QC complete	This project could have a large impact on the many wildlife and plant species, including the pygmy rabbit and sage-grouse as well as grassland species such as the long-billed curlew. Many of these habitats throughout the project area are already degraded from many other land uses, etc. livestock grazing disturbance, fences, water developments and ranching infrastructure, agency "treatments" that destroy native vegetation such as sagebrush and juniper.	27000 - Vegetation, 28000 - Wildlife (general), 28060 - Other Special Status Wildlife, 28070 - Sage-grouse
101380	3	2	NATIONAL AUDUBON SOCIETY-PRAIRIE FALCON SOCIETY,WESTERN WATERSHEDS,KATIE FITE,JULIE RANDELL	S = Special Interest Group	QC complete	The "South Hills" International Audubon Important Bird Area, only 8 miles to the east. Over 149 bird species inciuding Sage-grouse are known to move to and from the South Hills IBA every year during all seasons. Red Willow/Prairie Falcon Audubon Monthly bird count done for three years in the Burley BLM F.O. grazing allotments adjacent to the Jarbidge FO that is in	28040 - Migratory Birds, 28060 - Other Special Status Wildlife, 51020 - Segment 9 – Routes considered in the 2013 FEIS

Letter #	Comment #	Signatures	Letter owners	Group	Coding status	comment	category
						the project area segment 9. It is detailed and site-specific. More then 100 species of bird were found including BLM sensitive species.. This includes the Area of Critical Environmental Concern (ACEC) where Gateway West introduced new and additional information in their FEIS concerning the relocation of the transmission line to and through this important area that appears to violate Federal Land Policy Management Act (FLPMA) as well as NEPA. We noted that the map still shows that Gateway wants to proceed with this route. Despite a route already iocated away from this critical area. PFA has a vested interest and will continue to monitor this a area.	
101380	4	2	NATIONAL AUDUBON SOCIETY-PRAIRIE FALCON SOCIETY,WESTERN WATERSHEDS,KATIE FITE,JULIE RANDELL	S = Special Interest Group	QC complete	We are increasingly alarmed at migratory bird and bat collisions with transmission lines, and the migration routes and patterns (including areas where birds may be flying low under adverse weather conditions) must be fully examined. Migration routes in the region traversed by Gateway are very poorly understood. When renewable energy project analysis (such as the greatly flawed China Mountain EIS) have been prepared, BLM has not required that industry consultants conduct necessary multi-year intensive radar and other studies necessary to understand the large-scale conflicts with migrating passerines, raptors, or bats, including during inclement weather when migrating birds may be downed. The Gateway line could open up vast areas of deadly industrial wind development and even more powerline sprawl.	28000 - Wildlife (general), 28020 - Raptors/Eagles/Ravens, 28040 - Migratory Birds
101380	5	2	NATIONAL AUDUBON SOCIETY-PRAIRIE FALCON SOCIETY,WESTERN WATERSHEDS,KATIE FITE,JULIE RANDELL	S = Special Interest Group	QC complete	The mitigation modei is inadequate for sage grouse and other species of conservation concern. How can you mitigate the loss of wildlife habitat?	19000 - Mitigation (general), 28060 - Other Special Status Wildlife, 28070 - Sage-grouse
101380	6	2	NATIONAL AUDUBON SOCIETY-PRAIRIE FALCON SOCIETY,WESTERN WATERSHEDS,KATIE FITE,JULIE RANDELL	S = Special Interest Group	QC complete	Access to wildlife areas by the public on BLM llands from new roads to and along new powerlines will further diminish and degrade these places that heretofore were not easily accessed. • As we have already observed in areas of the proposed project, roads and powerlines greatly increase the danger of wildfire, including increased flammable weeds that proliferate in areas of disturbance. The project's new roads and powerlines, will exponentially increase this danger. Fires from Raptor electrocutions have ignited grasses as electrocuted birds hit the ground in Southern Idaho. All of these risks must be considered.	27000 - Vegetation, 27020 - Invasive Plants/weeds, 28020 - Raptors/Eagles/Ravens, 36000 - Recreation, 38000 - Transportation, 40000 - Electrical Environment, 41000 - Public Safety
101380	7	2	NATIONAL AUDUBON SOCIETY-PRAIRIE FALCON SOCIETY,WESTERN WATERSHEDS,KATIE FITE,JULIE RANDELL	S = Special Interest Group	QC complete	Is there really a need for the plethora of projects and corridor paths being proposed?	11000 - Purpose and Need for the Project
101380	8	2	NATIONAL AUDUBON SOCIETY-PRAIRIE FALCON SOCIETY,WESTERN WATERSHEDS,KATIE FITE,JULIE RANDELL	S = Special Interest Group	QC complete	PFA and WWP would like the following to be provided/included in the Gateway West Transmission Project Supplemental for Segments 8 and 9 Draft EIS. • A baseline for ecological conditions, and degree and severity of degradation that exists for all routes.	10000 - Conformance with the NEPA process
101380	9	2	NATIONAL AUDUBON SOCIETY-PRAIRIE FALCON SOCIETY,WESTERN WATERSHEDS,KATIE FITE,JULIE RANDELL	S = Special Interest Group	QC complete	• Clear and detailed mapping of biological, cultural, scenic, and other conflicts be provided.	23000 - Visual Resources, 24000 - Cultural Resources
101380	10	2	NATIONAL AUDUBON SOCIETY-PRAIRIE FALCON SOCIETY,WESTERN WATERSHEDS,KATIE FITE,JULIE RANDELL	S = Special Interest Group	QC complete	Show how all the alternatives correspond to the latest BLM Idaho Infrastructure Development Map ("Conflict Map") with a comprehensive overlay with Final EIS Map 2013 that's easy for interested public to view.	38000 - Transportation
101380	11	2	NATIONAL AUDUBON SOCIETY-PRAIRIE FALCON SOCIETY,WESTERN	S = Special Interest Group	QC complete	Address the adverse cumulative impacts on sagebrush and other native ecosystems and native biota of a plethora of new corridors/lines/energy developments/disturbances. Detailed in-depth analysis including full	27040 - Native vegetation, 43000 - Cumulative Effects

Letter #	Comment #	Signatures	Letter owners	Group	Coding status	comment	category
			WATERSHEDS,KATIE FITE,JULIE RANDELL			discussion of threats and stressors to each affected habitat and population must be provided and integrated so that a logical science-base conclusion can be drawn.	
101380	12	2	NATIONAL AUDUBON SOCIETY-PRAIRIE FALCON SOCIETY,WESTERN WATERSHEDS,KATIE FITE,JULIE RANDELL	S = Special Interest Group	QC complete	Address ongoing threats to the project area such as livestock overgrazing and invasive grasses and weeds, etc. The proposed project would only increase these impacts, these amendments would significantly downgrade protections to important natural resources such as visual, wildlife, and special designated areas	23000 - Visual Resources, 27020 - Invasive Plants/weeds, 28000 - Wildlife (general), 34000 - Land Use
101380	13	2	NATIONAL AUDUBON SOCIETY-PRAIRIE FALCON SOCIETY,WESTERN WATERSHEDS,KATIE FITE,JULIE RANDELL	S = Special Interest Group	QC complete	Full analysis of wildlife migration routes for this as well as all other potential routes or segments. Radar data on migrants must be collected for many portions of the route, in all effected BLM FO, the National Bird of Pray Area, and other areas critical to wildlife.	28000 - Wildlife (general), 28040 - Migratory Birds
101380	14	2	NATIONAL AUDUBON SOCIETY-PRAIRIE FALCON SOCIETY,WESTERN WATERSHEDS,KATIE FITE,JULIE RANDELL	S = Special Interest Group	QC complete	Analysis of risks, eg. Wildfire. Any LUP changes should include road/OHV closures in any new or upgraded roading caused by this project. Any upgraded roads should be returned to their original condition.	34030 - Federal land Use Plans, 35020 - Mitigation suggestions
101380	15	2	NATIONAL AUDUBON SOCIETY-PRAIRIE FALCON SOCIETY,WESTERN WATERSHEDS,KATIE FITE,JULIE RANDELL	S = Special Interest Group	QC complete	Information and independent analysis of why Idaho Power cannot focus on conservation measures with its customers and develop a really good smart grid, rather than wasting power and resources through long-distance transmission, and destroying so many areas of pubiic iands aiong with piacing another iethai hazard to birds and bats across so much public land. How much energy will be required to build this?	10010 - Out of scope comments
101380	16	2	NATIONAL AUDUBON SOCIETY-PRAIRIE FALCON SOCIETY,WESTERN WATERSHEDS,KATIE FITE,JULIE RANDELL	S = Special Interest Group	QC complete	Analysis of climate change adverse impacts that may result from Gateway and degradation and risks it poses.	39000 - Air Quality
101380	17	2	NATIONAL AUDUBON SOCIETY-PRAIRIE FALCON SOCIETY,WESTERN WATERSHEDS,KATIE FITE,JULIE RANDELL	S = Special Interest Group	QC complete	Tier the proposed actions to the current Idaho Comprehensive Wildlife Conservation Strategy document (ICWCS). These conservation strategies are mandated for all western states and considered a guiding document.	10010 - Out of scope comments
101380	18	2	NATIONAL AUDUBON SOCIETY-PRAIRIE FALCON SOCIETY,WESTERN WATERSHEDS,KATIE FITE,JULIE RANDELL	S = Special Interest Group	QC complete	Include any new information, studies, and analysis such as Golden Eagle studies that are done in the project areas.	28020 - Raptors/Eagles/Ravens, 45000 - Literature Used/Not Used
101380	19	2	NATIONAL AUDUBON SOCIETY-PRAIRIE FALCON SOCIETY,WESTERN WATERSHEDS,KATIE FITE,JULIE RANDELL	S = Special Interest Group	QC complete	As this is a project on public lands, a Cost/Benefit analysis be included.	10010 - Out of scope comments
101380	20	2	NATIONAL AUDUBON SOCIETY-PRAIRIE FALCON SOCIETY,WESTERN WATERSHEDS,KATIE FITE,JULIE RANDELL	S = Special Interest Group	QC complete	Any Plan amendments should be done to designate ACECs or otherwise to enhance and increase biological value, visual resource, or other important protections.	10010 - Out of scope comments
101381	1	1	YOUNG'S RIVERFRONT RANCH, LP,J LAVAR & JANET B YOUNG	B = Business or Business Group	QC complete	I approve the proposed Seg. 8 route that the Regional Advisory Committee (RAC) has proposed. The RAC has spent hundreds of hours and thousands of dollars in reviewing various routes and concluded on the proposed location through the NCA. Please don't change the route from the NCA. It is the best & safest route for all who are concerned on the Gateway West Transmission line Project.	41000 - Public Safety, 50010 - Segment 8 – Applicants' Proposed Route
101376	1	1	KAREN JENKINS	I = Individual (s) not affiliated	QC complete	I endorse the two routes sited in SRBOP & CA only. I oppose all other routes due to impacts on private lands, ag lands and Sage Grouse habitat. I am a private land owner in Oreana were we farm and ranch.	25060 - Agriculture, 28070 - Sage-grouse, 34010 - Private Land/Land Ownership, 50010 - Segment 8 – Applicants' Proposed Route, 51010 - Segment 9 – Applicants' Proposed Route

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101378	1	1	MICHELE HINTON	I = Individual (s) not affiliated	QC complete	Thank you for taking the RAC subcommittee routes as the preferred routes. Please expand & re-focus your enhancement portfolio as recommended by the RAC. The enhancement & mitigation plan needs to be sufficient to justify going through the Snake River Birds of Prey area.	35010 - Enhancement requirements, 35030 - Applicants' MEP (specific to NCA), 35040 - Recommendations for MEP changes, 50010 - Segment 8 – Applicants' Proposed Route, 51010 - Segment 9 – Applicants' Proposed Route
101371	1	1	GEORGENE MOORE	I = Individual (s) not affiliated	QC complete	Run Segment 8 thru the Birds of Prey	50010 - Segment 8 – Applicants' Proposed Route
101371	2	1	GEORGENE MOORE	I = Individual (s) not affiliated	QC complete	After the Kuna fire, the BOP area has been lacking in food and cover for the prey. The settlement for enhancement will benefit the BOP area and it will be less costly than the legal processes to run the line thru farms and ranches	27000 - Vegetation, 28020 - Raptors/Eagles/Ravens, 34010 - Private Land/Land Ownership, 35000 - NCA/SRBOP (general), 35010 - Enhancement requirements
101391	1	2	WESLEY ANDERSON,ROBBIN ANDERSON	I = Individual (s) not affiliated	QC complete	I am writing this comment to voice our displeasure and opposition to the placement of SEGMENT 8 from mile 126 to the Wilson (Hemingway) Idaho Power Substation. This routing of the line is right through the China Ditch subdivision and directly next to our property on China Ditch Road. It runs parallel to Trail Drive Road and is in a (not always) dry river bed.	33000 - Water Resources and Use, 50010 - Segment 8 – Applicants' Proposed Route
101391	2	2	WESLEY ANDERSON,ROBBIN ANDERSON	I = Individual (s) not affiliated	QC complete	We already have one high voltage power transmission line running over the subdivision on the west and we are highly opposed to having another high voltage transmission line on the east to enclose us in and further degrade our property values. Already we deal with decreased property values due to the size of the substation in our "front yard" and the current transmission line. Even the trees we have planted do little to hide the substation from our sight or the noise emitting from the lines.	23000 - Visual Resources, 25030 - Property Values, 34010 - Private Land/Land Ownership, 42000 - Noise
101391	3	2	WESLEY ANDERSON,ROBBIN ANDERSON	I = Individual (s) not affiliated	QC complete	my father has a heart pacemaker and defibrillator that causes heaviness and tightness in his chest every time he attempts to take walks anywhere close to the already existing high voltage transmission lines. Because of that, he is unable to go near these lines. Enclosing our property with additional lines on the east side of our home will likely cause an increase in those symptoms and possibly increased health issues for him.	41000 - Public Safety
101391	5	2	WESLEY ANDERSON,ROBBIN ANDERSON	I = Individual (s) not affiliated	QC complete	we do NOT approve the proposed Segment 8 route through the Morley Nelson Snake River Birds of Prey NCA, and the China Ditch Subdivision. Instead, we do approve the BLM Preferred Alternative Routes that move the lines further away from our homes.	50010 - Segment 8 – Applicants' Proposed Route, 50020 - Segment 8 – Routes considered in the 2013 FEIS
101305	3	1	BLM RAC SUBCOMMITTEE,KAREN STEENHOF	I = Individual (s) not affiliated	QC complete	The statement on Page 6 of the August draft that "the Project would have no adverse impacts of the values for which BOPNCA was designated" is erroneous and misleading. The subcommittee found that the routes through the BOPNCA could minimize adverse impacts on resources, but they did not assert that they would eliminate them. In fact, the draft plan itself acknowledges possible adverse impacts, including habitat fragmentation (page 30), damage to slickspot peppergrass populations (pages 29-30) and increased public access on roads that may increase vandalism, weed infestation, and litter (page 34).	27010 - Special Status Plants, 27020 - Invasive Plants/weeds, 28010 - Habitat Fragmentation, 35000 - NCA/SRBOP (general), 36000 - Recreation, 38000 - Transportation
101305	4	1	BLM RAC SUBCOMMITTEE,KAREN STEENHOF	I = Individual (s) not affiliated	QC complete	In addition, the Project will have visual impacts on the landscape as well as direct impacts to important winterfat communities. The transmission lines will likely attract more ravens to the area. Recent evidence suggests that ravens are predators of Burrowing Owls. The Companies' claim that the transmission lines will have no impact on raptors is not substantiated because the Project could adversely affect raptors now nesting on existing transmission lines that the new lines will replace/ parallel if construction activities are not timed appropriately and if the Project does not provide suitable nesting substrates.	23000 - Visual Resources, 27040 - Native vegetation, 28000 - Wildlife (general), 28020 - Raptors/Eagles/Ravens, 35000 - NCA/SRBOP (general)
101305	5	1	BLM RAC SUBCOMMITTEE,KAREN STEENHOF	I = Individual (s) not affiliated	QC complete	The RAC subcommittee could not endorse the enhancement package presented earlier this year, and the August version has not changed substantially. The Companies' enhancement package does not demonstrate how standards of enhancement will be met during the life of the project. The	12000 - Relationships to other federal laws and policies, 25000 - Socioeconomics, 35010 - Enhancement requirements, 35030 - Applicants' MEP (specific to

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						subcommittee encouraged BLM to take a hard look at the true cost of enhancement and advised that although the enhancement package should not be punitive, it must meet the high standards outlined in the BOPNCA legislation. The subcommittee recommended assessments of the environmental, social and economic benefits and costs of lines crossing the BOPNCA, and it encouraged the BLM and the Companies to derive a valid economic assessment of the benefits and costs of the actions specific to the BOPNCA as part of the NEPA process.	NCA), 35040 - Recommendations for MEP changes, 46000 - Refers to Previously Submitted Comments
101305	6	1	BLM RAC SUBCOMMITTEE,KAREN STEENHOF	I = Individual (s) not affiliated	QC complete	I urge the BLM and the Companies to re-consider the RAC subcommittee comments on the Enhancement package. The May 30 report identifies deficiencies in the plan that still have not been addressed, and it recommends actions that have not been included in the revised plan. The subcommittee found that the Draft Portfolio did not adequately address enhancement of raptor populations and scientific resources and values, and it recommended that the BLM and the Companies re-evaluate priorities The subcommittee recommended that the enhancement package focus on resources within the BOPNCA that are truly in need of enhancement: raptor populations and habitats. The portfolio should be based on a landscape-scale strategy for habitat protection, restoration, and enhancement. It should reduce the emphasis on small microcosms. The RAC subcommittee recommended that the Companies de-emphasize public education in the enhancement plan. The subcommittee found that 1) the BLM already has an excellent public education program for the BOPNCA, 2) many groups are already involved in public education about the BOPNCA, and 3) public education is currently closer to meeting objectives than other programs. The subcommittee recommended re-evaluating whether a land purchase should be a priority because the benefits are not clear. If land purchase is a component of the enhancement package, the subcommittee recommended that some degree of funding should be included to help manage these lands. None of these concerns were addressed in the Companies' revision. The Companies and BLM have invested a great deal of time and money in this project, and it appears they have finally gotten public support for feasible, proposed routes. However, the proposed routes will be dead on arrival if the Companies don't invest more in constructive and effective mitigation and enhancement. Please don't let an insufficient enhancement plan stop the progress that has been made thus far. SPECIFIC COMMENTS ON THE ENHANCEMENT PLAN Page 6: the statement that "the Project would have no adverse impacts of the values for which BOPNCA was designated" is erroneous, misleading, and unsubstantiated. Page 9: Section 2.4 emphasizes the benefits of lattice structures but fails to acknowledge that the double-circuit structures in Segment 9 have been proposed to be tubular metal poles that will not be raptor-friendly. Page 18: the statements that "the transmission line does not adversely affect the resources and values for which this element of the NLCS was designated" and "the project does not have an adverse effect on raptor populations including the raptor prey base, and that no enhancement should be required" are erroneous, misleading, and unsubstantiated. Pages 30-31: As I pointed out in my comments on the draft EIS, these one-mile buffers around nests are meaningless and are not, as claimed, based on the best available science. The probability of affecting raptors depends on topography and other factors, not merely distance. I do not understand why the Companies continue to pursue this useless analysis. Page 31. The statement that "It is clear from the existing literature and	10000 - Conformance with the NEPA process, 28020 - Raptors/Eagles/Ravens, 35000 - NCA/SRBOP (general), 35010 - Enhancement requirements, 35020 - Mitigation suggestions, 35030 - Applicants' MEP (specific to NCA), 35040 - Recommendations for MEP changes, 40000 - Electrical Environment, 46000 - Refers to Previously Submitted Comments, 48000 - Design Features

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						observations within the BOPNCA that transmission lines do not adversely affect and apparently enhance the raptor and raven populations" needs to be re-evaluated. Our research (Steenhof et al. 1993) showed that transmission lines COULD (not would) be compatible with raptor nesting, and that nest site modifications could attract raptors and enhance their nesting success. We also stated that we found no short-term effects of electromagnetic fields on raptors but that additional study was needed to evaluate long-term effects. That said, I agree that the BLM's assertions in the Final EIS that enhanced raptor populations will adversely affect prey populations are unfounded. Page 32: The statement that "there was not an influx in the area due to building of the transmission line" is incorrect. Steenhof et al. 1993 reported that the 500-kV transmission line was "responsible for increased numbers of breeding raptors and ravens in the portions of southern Idaho and Oregon that we surveyed."	
101307	1	1	KELLI LEAVITT	I = Individual (s) not affiliated	QC complete	There is no need to look at any other routes and I approve the proposed Segment 8 route that the Regional Advisory Committee has proposed. The RAC has spent hundreds of hours and thousands of dollars in reviewing various routes and concluded on the proposed location through the NCA. PLEASE DO NOT CHANGE THE ROUTE FROM THE NCA!	50010 - Segment 8 – Applicants' Proposed Route
101330	1	1	GERALD GUENTZ,LORENE GUENTZ	I = Individual (s) not affiliated	QC complete	I approve the proposed Segment 8 route the Regional Advisory Committee has proposed the RAC has spent hundred of dollars + hours, thousands of dollars in reviewing various routes and concluded on the proposed location through the NCA.	50010 - Segment 8 – Applicants' Proposed Route
101331	1	1	OPAL WARD	I = Individual (s) not affiliated	QC complete	I support the routes recommended by the RAC subcommittee as seen in Appendix D-10, D-16, and D-22; in the book of maps on Gateway West Segments 8 and 9 - May 30, 2014.	50010 - Segment 8 – Applicants' Proposed Route
101331	2	1	OPAL WARD	I = Individual (s) not affiliated	QC complete	I am disappointed in that the Companies did not accept all of the sub committee recommendations about the mitigation and enhancement plan. There are general recommendations, (see pages 12 and 13) and specific recommendations, (see pages 14 & 15) in the RAC Subcommittee review and comments. (May 30, 2014) I would like to know why Idaho Power did not accept the recommendations of the subcommittee - I would like to ask Idaho Power to expand and refocus their enhancement portfolio per the subcommittee recommendations. Does the BLM think the proposed enhancement will be adequate to meet legislative requirements? How will the standard of enhancement be met? The BLM needs to take a hard look at the true cost of enhancement. The proposed funding levels are too low. There should be larger strategic areas for the habitat restoration. Enhancement measures should improve or at least maintain current raptor population levels.	10000 - Conformance with the NEPA process, 28020 - Raptors/Eagles/Ravens, 35010 - Enhancement requirements, 35020 - Mitigation suggestions, 35030 - Applicants' MEP (specific to NCA), 35040 - Recommendations for MEP changes, 46000 - Refers to Previously Submitted Comments
101332	1	1	RICK & KRISTI MORINO	I = Individual (s) not affiliated	QC complete	I strongly encourage you to approve the route proposed for segment 8 that is suggested by the RAC. Please do not chance the route from the NCA.	50010 - Segment 8 – Applicants' Proposed Route
101309	1	2	WESTERN WATERSHEDS,KATIE FITE,JULIE RANDELL	S = Special Interest Group	QC complete	We are submitting this cd with current scientific literature that we request you fully consider in developing a suitable range of alternatives for the EIS that must minimize harm to sagebrush species, watersheds, recreational uses and enjoyment of public lands and a wealth of other values.	10000 - Conformance with the NEPA process, 28000 - Wildlife (general), 33000 - Water Resources and Use, 36000 - Recreation, 45000 - Literature Used/Not Used
101309	2	2	WESTERN WATERSHEDS,KATIE FITE,JULIE RANDELL	S = Special Interest Group	QC complete	The scientific literature also addresses risks posed by invasive species linked to grazing, roading, and other disturbances in the project area; and the risks posed by climate change (activities such as grazing that will be occurring across the lands disturbed by Gateway amplify adverse effects of climate change) and many other factors.	27020 - Invasive Plants/weeds, 38000 - Transportation
101309	3	2	WESTERN WATERSHEDS,KATIE FITE,JULIE RANDELL	S = Special Interest Group	QC complete	We also believe these documents show how flawed the mitigation plan for the Gateway process is – as it does not serve to effectively conserve, enhance and	12000 - Relationships to other federal laws and policies, 28060 - Other Special Status Wildlife, 28070 - Sage-

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						restore sage-grouse and other sensitive and imperiled species habitats, as required by the BLM sensitive species policy, various Land Use Plans, the BLM National Technical Team Report and IMs, and FLPMA. They also highlight the synergistic and cumulative threats facing the native biota impacted b this project.	grouse, 34030 - Federal land Use Plans, 35030 - Applicants' MEP (specific to NCA), 43000 - Cumulative Effects
101309	4	2	WESTERN WATERSHEDS,KATIE FITE,JULIE RANDELL	S = Special Interest Group	QC complete	As with our comments, protest, Appeals of the preceding process (incorporated in full here), we stress that full current baseline surveys and studies must be conducted for all species of importance and the ecological conditions in this landscape. How viable are current populations of rare or imperiled species? Which populations may suffer significant harm from Gateway? How is poor land health further impacting these habitats and populations?	27000 - Vegetation, 28000 - Wildlife (general)
101309	5	2	WESTERN WATERSHEDS,KATIE FITE,JULIE RANDELL	S = Special Interest Group	QC complete	We request a meeting to discuss our concerns with the current version of the segmented Gateway EIS project with Project Managers. Tis includes what we believe is the purposeful splitting of the process into what now appear to be two EIS processes – yet decisions affecting routes in the current process were made in the previous EIS Record of Decision. BLM must use this current process to correct the seriously flawed route east of Salmon Falls Creek and other areas with high conflicts and that are not in the public interest.	10000 - Conformance with the NEPA process, 51010 - Segment 9 – Applicants' Proposed Route
101353	1	1	MICHAEL STUKEL	I = Individual (s) not affiliated	QC complete	I own 160 acres Southeast of Kuna, Idaho. There is no need to look at any other routes and I approve the proposed Segment 8 route that the Regional Advisory Committee (RAC) has proposed. The RAC has spent hundred of hours and thousands of dollars in reviewing various routes and concluded on the proposed location through the NCA. Please do not change the route from the NCA.	50010 - Segment 8 – Applicants' Proposed Route
101308	1	1	MICHAEL KOCHERT	I = Individual (s) not affiliated	QC complete	I am an emeritus scientist with the U.S. Geological Survey. I have conducted and directed research and monitoring of raptors, prey, and vegetation in the SRBOP for nearly 45 years. I also studied colonization and use of the 500 kV PP&L (PacifiCorp) transmission line by raptors and ravens with agency and industry colleagues for 10 of those years. My comments are based on that frame of reference It is good that the Companies adopted the routes recommended by the Boise District Resource Advisory Council (RAC). In my opinion, these routes provide the best alternatives to avoid private land and sagegrouse issues and to minimize human and resource conflicts.	16000 - Generally support project, 28070 - Sage-grouse, 34010 - Private Land/Land Ownership, 50010 - Segment 8 – Applicants' Proposed Route, 51010 - Segment 9 – Applicants' Proposed Route
101308	2	1	MICHAEL KOCHERT	I = Individual (s) not affiliated	QC complete	A short-coming of the August 2014 Mitigation and Enhancement Portfolio is that the Companies did not adopt the RAC subcommittee's recommendations in the revision of the portfolio. Because the proposed routes run through the SRBOP, the proposal needs to be accompanied by a substantial plan to mitigate and enhance resources and values within the SRBOP. This plan needs to be accompanied by a strategy to evaluate the effects (enhancing as well as adverse) of the line and to monitor the success of the enhancement and mitigation efforts in the SRBOP. I am pleased to see that portfolio provides a basis in Section 6.3 for developing a plan for monitoring the effectiveness for mitigation and enhancement actions.	20000 - Monitoring, 35000 - NCA/SRBOP (general), 35010 - Enhancement requirements, 35030 - Applicants' MEP (specific to NCA), 35040 - Recommendations for MEP changes
101308	3	1	MICHAEL KOCHERT	I = Individual (s) not affiliated	QC complete	"Although the Enhancement and Mitigation package is quite comprehensive, a major deficiency of the package is that it lacks a monitoring component. Given that the package identifies a fairly substantial investment for many enhancement and mitigation actions, it is very important to evaluate the effectiveness of those actions. For example, I sensed at the meeting that there was not complete agreement on the predicted success rate of the habitat restoration efforts. As I stated at the meeting, I commend the parties involved for proposing to undertake such a challenging effort. However, given the extremely dry climate in the NCA in the recent past and predicted for the future, success of restoration efforts in the low precipitation zone in the	20000 - Monitoring, 27000 - Vegetation, 28020 - Raptors/Eagles/Ravens, 35000 - NCA/SRBOP (general), 35010 - Enhancement requirements, 35030 - Applicants' MEP (specific to NCA), 35040 - Recommendations for MEP changes, 46000 - Refers to Previously Submitted Comments

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						Grand View and Bruneau areas could be extremely low. Even in decent precipitation years vegetation restoration in these areas could be a challenge. Given the uncertainty, I believe that restoration efforts should be monitored for effectiveness." "I suggest that the Enhancement and Mitigation package provide for development of a comprehensive, peer reviewed monitoring plan. The monitoring efforts, if designed properly, would provide the opportunity to for adaptive management experiments. The plan should identify the metrics for success. For example, will restoration success be a measure of 101308 Page 1 of 4 vegetation in the restored areas or will it be prey composition and density, or reproductive performance of the nesting raptors?" "Because construction of the transmission lines and the major proposed enhancement actions have the potential to ultimately affect the raptor populations, I believe it is incumbent to monitor the status of the major raptors in the area. I believe that colonization of the transmission line should be monitored much like it was done with establishment of the PP&L 500-kV transmission line in the 1980s (Steenhof et al. 1993). The monitoring of the PP&L line provided valuable information to the utility, and it also identified the effect of the line on the raptor and raven population." "It seems to me that the goal of the large-scale restoration efforts is to enhance the habitat and ultimately enhance or maintain the raptors. In my opinion, evaluating the effectiveness of largescale restoration efforts without assessing raptor populations is falling short of completely evaluating the effectiveness of restoration efforts. A well-designed monitoring effort at the three main trophic levels would serve as a good adaptive management experiment for the restoration efforts." The Companies' position not consider the raptors in the mitigation and enhancement portfolio because they assert that the lines will pose no adverse effects to raptors could be viewed as short-sighted	
101308	4	1	MICHAEL KOCHERT	I = Individual (s) not affiliated	QC complete	Providing new and secure nesting substrate for many raptor species through construction of the line may be the one of the most positive enhancement efforts the Companies can implement. Also to say the lines will have no adverse impacts on raptors is incorrect. Recent research suggests that ravens are predators of Burrowing Owls, and as Steenhof et al. 1993 have shown, ravens will likely be readily attracted the new 500kV transmission line. If construction activities are not timed appropriately and if suitable nesting substrates are not provided, the Project potentially could adversely affect raptors now nesting on existing transmission lines (such as the Big Baha 138 kV line and the PacifiCorp) that the new lines will replace or parallel	28000 - Wildlife (general), 28020 - Raptors/Eagles/Ravens, 35000 - NCA/SRBOP (general), 35010 - Enhancement requirements, 35020 - Mitigation suggestions, 35030 - Applicants' MEP (specific to NCA), 35040 - Recommendations for MEP changes, 48000 - Design Features
101308	5	1	MICHAEL KOCHERT	I = Individual (s) not affiliated	QC complete	I recommend that the BLM and the Companies re-consider the RAC subcommittee comments on the Mitigation and Enhancement package. As I presented in my January 2014 comments, the portfolio should be based on a landscape-scale strategy for habitat protection, restoration, and enhancement	35020 - Mitigation suggestions, 35030 - Applicants' MEP (specific to NCA), 46000 - Refers to Previously Submitted Comments
101308	6	1	MICHAEL KOCHERT	I = Individual (s) not affiliated	QC complete	Below are my specific comments: Page 6: the statement that "...the Project would have no adverse impacts of the values for which SRBOP was designated.." is inaccurate. Although there may be "few" impacts to raptors, there could be some adverse effects of the lines as I pointed out earlier in my comments. The portfolio even identified possible negative effects of the lines including habitat fragmentation, damage to slickspot peppergrass populations, and increased public access from the new roads.	27010 - Special Status Plants, 28010 - Habitat Fragmentation, 28020 - Raptors/Eagles/Ravens, 35040 - Recommendations for MEP changes, 38000 - Transportation
101308	7	1	MICHAEL KOCHERT	I = Individual (s) not affiliated	QC complete	Page 9: Section 2.4 emphasizes the benefits of lattice towers like those on the existing 500 Kv PacifiCorp line in the SRBOP. However, the plan needs to clarify that this only applies to Segment 8. The doublecircuit structures in Segment 9 are proposed to be tubular metal poles. It is my understanding this configuration may not be conducive to nesting raptors	28020 - Raptors/Eagles/Ravens, 35040 - Recommendations for MEP changes, 48000 - Design Features

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101308	8	1	MICHAEL KOCHERT	I = Individual (s) not affiliated	QC complete	Pages 30-31: The Companies need clarify the use of the 1.0 mile (1.6 km) buffers around nests because the application is unclear. Is this a disturbance buffer? If the buffer is based on Suter and Joness (1981), the buffer is based on opinions and not quantitative research. Also the probability of the line affecting raptors depends on other factors than just distance, such as topography. It is not clear what kind of analysis the Companies are conducting. Page 32: The statement that "Thus there was not an influx in the area due to building of the transmission line....." is not entirely correct. I believe the authors are referring to roosting ravens, but it is not entirely clear as written. This needs to be clarified because Steenhof et al. (1993) documented that the 500-kV PP&L transmission line was responsible for increased numbers of breeding raptors and ravens. Also, the PP&L 500 kV line in the 1980s appeared to have drawn in ravens from outside the NCA the roost on the north boundary of the NCA	28020 - Raptors/Eagles/Ravens, 35040 - Recommendations for MEP changes, 45000 - Literature Used/Not Used
101308	9	1	MICHAEL KOCHERT	I = Individual (s) not affiliated	QC complete	Page 34. No. 7. It is unclear to me how this property purchase will enhance SRBOP values. The BLM and the Companies need to clarify this matter. I would understand the need if there were a potential threat to the cultural resources.	24000 - Cultural Resources, 35030 - Applicants' MEP (specific to NCA), 35040 - Recommendations for MEP changes
101308	10	1	MICHAEL KOCHERT	I = Individual (s) not affiliated	QC complete	Page 40 (top). I believe that it is important that research and monitoring be part of the list. The portfolio identifies a substantial sum to be spent on restoring about 1,500 A, a minute proportion of the amount of area in need of restoration. Given there are differing views on the probability of success of these restoration projects and few restoration projects in the SRBOP have been successful in the last 30 years, it seems to me that funding for research that assesses the trajectory of the system with or without restoration would be appropriate. For example, preliminary research in the SRBOP suggests that some Golden Eagles are quite resilient in extensively burned habitats and may be adapting to altered environment. I personally think understanding the new system in some cases will be more effective than trying to fight it.	20000 - Monitoring, 28020 - Raptors/Eagles/Ravens, 35030 - Applicants' MEP (specific to NCA), 35040 - Recommendations for MEP changes
101308	11	1	MICHAEL KOCHERT	I = Individual (s) not affiliated	QC complete	Page 43. 6.1.4. I agree that enforcing the management rules and informing the public about the SRBOP is greatly needed. However, given the enormous problems with habitat change and threats to the raptor populations, I am dubious about enhancing the public education program. I agree with the findings of the RAC subcommittee on this matter. The subcommittee found that 1) the BLM already has an outstanding public education program for the SRBOP, 2) many groups are already involved in public education about the SRBOP, and 3) public education is currently closer to meeting objectives than other programs	35020 - Mitigation suggestions, 35030 - Applicants' MEP (specific to NCA), 35040 - Recommendations for MEP changes, 46000 - Refers to Previously Submitted Comments
101308	12	1	MICHAEL KOCHERT	I = Individual (s) not affiliated	QC complete	Page 47. The Companies' reasons not to commit to installation of artificial nesting platforms is unclear. It is my impression that the U.S. Fish and Wildlife Service personnel are amendable to nest site enhancements. Also, use of nesting platforms is not new with Idaho Power, particularly on the138 kV Big Bah power line in the SRBOP. I believe that biologists and engineers should collaborate before line construction to develop tower modifications (including nest platforms) that benefit raptors and deter ravens. Nesting platforms were part of the line construction plan in of the 500 kV transmission line erected by PP&L (PacifiCorp) through what is now the SRBOP. This action was a very positive enhancement effort (Steenhof et al. 1993). Pages 49 - 50. I believe that a representative of the USGS, Forest and Rangeland Ecosystem Science Center (FRESC) should be a member of the oversight committee. FRESC scientists, particularity those from the Snake River Field Station (SRFS), have been conducting research and monitoring of all trophic levels in the SRBOP for decades. Respectfully submitted,	28020 - Raptors/Eagles/Ravens, 35030 - Applicants' MEP (specific to NCA), 35040 - Recommendations for MEP changes, 48000 - Design Features

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101306	1	3	GOLDEN EAGLE AUDUBON SOCIETY,MICHELE CRIST,SEAN FINN,ALISON LYON-HOLLORAN	S = Special Interest Group	QC complete	These comments follow comments the Golden Eagle Audubon Society submitted to the Bureau of Land Management Resource Advisory Committee Gateway West Subcommittee Co-Chairs (submitted in February 2014). Those comments, which were largely ignored by the Companies during this revision process are included here as Appendix A. General Comments GEAS applauds Rocky Mountain Power and Idaho Power's (hereafter, 'the Companies') pledge to work "in spirit of cooperation" to "meet enhancement requirements" (p. 6) and the thoughtfulness the Companies have put forth for the need for remediation (i.e., habitat restoration component is scaled to the number of acres impacted during construction, p. 35). However, we are shocked and dismayed at the Companies apparent failure to fulfill on that pledge by undercutting prior offers at substantive support for mitigation and enhancement for completion of the Gateway Transmission line. Unlike, prior versions, the August 2014 documents do not give the impression that the Companies are truly enthused about supporting the intent of the National Conservation Area legislation, nor enhancement of raptor populations or habitats. The complete lack of consideration about how tower lattice structures might be modified to benefit raptors, the inaccurate justifications to reduce funds for habitat restoration, and the lack of suitable support for monitoring – all of which we detail below – are disappointing steps backward and, from our perspective, reduce the likelihood that approvals of these proposed routes will occur. GEAS is expecting the Companies to embrace a landscape-scale approach to enhancing SRBOP and implores the Companies to reconsider this portfolio. We caution the Companies that this current substandard approach will reverse GEAS's support for routing Segments 8 and 9 through the NCA, and further, we suspect that this portfolio will be widely disparaged by the emerging array of conservation groups that are rallying around the SRBOP landscape.	20000 - Monitoring, 28020 - Raptors/Eagles/Ravens, 35030 - Applicants' MEP (specific to NCA), 35040 - Recommendations for MEP changes, 46000 - Refers to Previously Submitted Comments, 50010 - Segment 8 – Applicants' Proposed Route, 51010 - Segment 9 – Applicants' Proposed Route, 48000 - Design Features
101306	2	3	GOLDEN EAGLE AUDUBON SOCIETY,MICHELE CRIST,SEAN FINN,ALISON LYON-HOLLORAN	S = Special Interest Group	QC complete	GEAS feels the revised portfolio is not in the spirit of cooperation nor extraordinary in any way. We are disappointed that the portfolio offers a substantially reduced fund value for the BLM-preferred routes. We read through the Companies' justification for the reduced Fund Value, and we simply disagree with the ecological justifications as well as areal ratio justifications (5.4, p. 37). We object to the questionable reference to state-and-transition modeling approaches as both a justification that the Companies are not accountable or responsible for some habitat restoration and to somehow suggest that state-and-transition models are a tool to 'write off' some areas because they have crossed into a state that is not restorable. Because this reference is so erroneous, Portfolio reference cannot be considered "science-based". Leaving that egregious inappropriate use aside (though we suggest the portfolio authors consult with professionals that design and use such models), we do not agree that "baseline" should be considered current condition of the vegetation (page 36). Enhancement implies a functioning, resilient system and the current condition is not. Pay attention here: if the vegetation community, especially under Segment 9, was in a native functioning state, GEAS would have not recommended it as a potential route. The fact that that area is already degraded is justification for routing a transmission line there, not an excuse for habitat restoration mitigation in the SRBOP. The term 'mitigation' implies a trade off, space-for-space. Neither the Companies nor GEAS intended that the restoration would occur immediately under the lines, but rather that restoration is intended to occur on "off-site small-project" areas (Section 5.3, p. 36). Therefore, the current condition of vegetation in the project "footprint" is irrelevant. We are	27000 - Vegetation, 35000 - NCA/SRBOP (general), 35010 - Enhancement requirements, 35020 - Mitigation suggestions, 35030 - Applicants' MEP (specific to NCA), 35040 - Recommendations for MEP changes

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						highly disappointed the Companies use this inference in the first place, and we are insulted they pass this off as "science-based". Please reconsider – move back toward a spirit of cooperation – and account for the full project footprint (both temporary disturbance and long-term occupancy) when calculating restoration investment ratios.	
101306	3	3	GOLDEN EAGLE AUDUBON SOCIETY,MICHELE CRIST,SEAN FINN,ALISON LYON-HOLLORAN	S = Special Interest Group	QC complete	Our second concern is the apparent pull back from the spirit of cooperation (POD Supplement, pages 6, 9, 18, 24) in the new Portfolio. In short, the Companies will sustain equal benefit (amount of power transmitted) no matter where the lines are routed, so why would they offer approximately ½ of the Fund value for BLM-preferred routes (Table 10, p. 49) vs. Proposed routes (Table 9, p. 49). This seems like basic economics. The Companies calculated in their Dec. 2013 Portfolio a Fund Value that was acceptable to the overall cost of routing, therefore, that fund value (approximately $8.5 million) should be economically viable for the BLM preferred routes described in the August 2014 Portfolio. Instead, the Companies trimmed the margin. GEAS does not consider that extraordinary by any means. In fact, it occurs to us that it is rather ordinary, and a tactic employed by an organization acting exactly opposite of a "spirit of cooperation". Our admittedly pedestrian assessment of the economics differences among the Proposed routes and the BLM preferred routes is exactly opposite of the revised offer by the Companies. We estimate that the BLM preferred routes will be shorter than the Proposed Routes by about 10 miles. At a rough guess of $1 million/mile installation costs, the new routes are saving the Companies about $10 million. Further savings incurred by not having to build as many roads, not having to obtain costly private-land easements, and the availability of flat terrain routing (as opposed to weaving through Owyhee canyon lands and between and around farms and residences) would certainly reduce installation costs. As GEAS suggested right from the beginning, routing lines through SRBOP could be a win-win-win for sage-grouse, raptors, the SRBOP, and the Companies. We are now beginning to seriously doubt the Companies spirit of cooperation. Instead of enthusiastically acknowledging the increased efficiencies achieved by routing through SRBOP and applying some of those cost-savings to improving conditions for raptor populations and habitat, the Companies pulled back, taking a nickel-and-dime approach, and seriously undercut the support and trust they initially garnered from GEAS, other stakeholders, and the RAC subcommittee. GEAS implores the companies: change your stance, invest in the SRBOP, and move ahead with us as a highly valued partner in an enhanced SRBOP.	25000 - Socioeconomics, 35000 - NCA/SRBOP (general), 35030 - Applicants' MEP (specific to NCA), 35040 - Recommendations for MEP changes
101306	4	3	GOLDEN EAGLE AUDUBON SOCIETY,MICHELE CRIST,SEAN FINN,ALISON LYON-HOLLORAN	S = Special Interest Group	QC complete	We are also surprised that the Companies would undercut the cost of restoration per acre and not incorporate the cost of restoration per acre calculated in the Gateway West Transmission Line FEIS, released on April 26, 2012. Appendix J and associated tables (6, 7, 8, 9, p. 14-16 and Table D4, p. D-7) describe the methodology for determining costs for mitigation and is prepared by SWCA consultants, Idaho BLM, and Wyoming Fish and Game. Proposed mitigation costs for sagebrush restoration range from approximately $4000.00 to $8200.00 per acre and include a 50% markup for indirect costs associated with implementation such as writing of contracts, etc. This approach was developed by Allen et al. (2005) and is supported in the economic literature. The Companies must reconsider their mitigation and enhancement costs and follow methodologies that calculate accurate mitigation and enhancements costs, as well as include ongoing costs resulting from loss of services (e.g. tourism and habitat) that the SRBOP NCA will incur during transmission line construction.	25000 - Socioeconomics, 35010 - Enhancement requirements, 35020 - Mitigation suggestions

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101306	5	3	GOLDEN EAGLE AUDUBON SOCIETY,MICHELE CRIST,SEAN FINN,ALISON LYON-HOLLORAN	S = Special Interest Group	QC complete	Highly inaccurate success estimate for restoration of native plant communitiesEstimates of 80% success at restoration plots, as we suggested in prior comments, is grossly overstated for revegetation efforts in the SRBOP. The Companies continued reference to those success ratios indicates they are not being sensitive to the vast amount of local plant community ecology and restoration knowledge available. We contend that the habitat treatment success rates estimated in the Portfolio (80%) counters what restoration ecologists working in the SRBOP have found. The success of treatments in the precipitation and temperature zone occupied by SRBOP has very low restoration success for reseeding and other habitat enhancements using traditional approaches (M. Germino, D. Shinneman, and D. Pilliod, pers. comm., USGS) due to SRBOP susceptibility to invasion by cheatgrass and accelerated fire cycle. Some habitat projects for the sole purpose of vegetation enhancement have actually increased the spread of cheatgrass. Work by Brooks and Chambers (2011) on resistance and resilience highlights the difficulties that must be confronted by restoration efforts in these dry, low elevation areas and represents the kind of science that should be understood before implementing a restoration plan in the SRBOP. The Companies must reconsider these erroneous estimates and adjust per-acre investments appropriately.	27000 - Vegetation, 35000 - NCA/SRBOP (general), 35030 - Applicants' MEP (specific to NCA), 35040 - Recommendations for MEP changes, 45000 - Literature Used/Not Used
101306	6	3	GOLDEN EAGLE AUDUBON SOCIETY,MICHELE CRIST,SEAN FINN,ALISON LYON-HOLLORAN	S = Special Interest Group	QC complete	Missed opportunity to enhance raptor nesting and perching sites The Companies claim that the transmission lines will have no impact on raptors (POD Supplement, page 33) is not substantiated because the Project could adversely affect raptors now nesting on existing transmission lines if the new structures do not have suitable alternative nesting substrates. Section 2.4 of the POD Supplement emphasizes the benefit of lattice structures but fails to acknowledge that the double-circuit structures in Segment 9 are proposed to be tubular metal poles that will not be raptor-friendly. Research in the NCA has shown that transmission lines might be beneficial to raptors (Steenhof et al. 1993). But that benefit is not inherent: nest site modification might be necessary to ensure they provide suitable, safe benefit to raptors. The Companies failure to commit to installation of artificial nesting platforms (page 47) is very disappointing, especially since the Companies highlight and advertise this practice in literature describing their corporate social responsibility. It is essential that engineers work with biologists – and SW Idaho is highly populated with very experienced raptor biologists – before line construction to ensure that tower modifications include safe, effective nest platforms that benefit raptors and deter ravens.	28020 - Raptors/Eagles/Ravens, 35000 - NCA/SRBOP (general), 35030 - Applicants' MEP (specific to NCA), 35040 - Recommendations for MEP changes, 48000 - Design Features
101306	7	3	GOLDEN EAGLE AUDUBON SOCIETY,MICHELE CRIST,SEAN FINN,ALISON LYON-HOLLORAN	S = Special Interest Group	QC complete	The Companies claim that prey populations are not affected by the enhancement of raptor and raven populations is utterly false. The Companies failed to implement a complete literature review on the effects of transmission lines on prey populations due to an enhancement (increase) of avian predators. Benitiz-Lopez 2014, Coates et al. 2014, Coates and Delehanty 2010, Dinkins 2013, Howe et al. 2014, Leu and Hanser 2011, and Shroeder, 2010 demonstrate the effect of enhanced avian predator populations resulting from transmission lines on prey populations. This effect has been largely studied now in sage-grouse populations and is why we recommend avoiding transmission line construction in or within close proximity to sage-grouse habitat. Furthermore, there is much literature available on the negative effects transmission lines have on small mammal populations due to habitat fragmentation causing loss and degradation of habitat and isolated populations	28000 - Wildlife (general), 28010 - Habitat Fragmentation, 28020 - Raptors/Eagles/Ravens, 28070 - Sage-grouse, 35030 - Applicants' MEP (specific to NCA), 35040 - Recommendations for MEP changes, 45000 - Literature Used/Not Used

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101306	8	3	GOLDEN EAGLE AUDUBON SOCIETY,MICHELE CRIST,SEAN FINN,ALISON LYON-HOLLORAN	S = Special Interest Group	QC complete	Lack of a reliable monitoring strategy Permit PL 103-64 charges the BLM with demonstrating that the enhancement program will result in a net benefit to SRBOP for the duration of the permit. Because the Companies have not shown the needed investment in monitoring of raptor population, prey response, and habitat restoration, GEAS feels the Companies may invalidate the intent of the permit. Monitoring is an essential part of the mitigation and enhancement program and the Companies must appropriately fund the costs of a well-rounded, long-term monitoring strategy that address the investments of this draft MEP. With appropriately funded monitoring, the Committee and BLM would be able to assess and identify restoration strategies that work best, evaluate recovery rates and responses of wildlife to those strategies over time, and fully utilize an adaptive management approach. This in turn would benefit all stakeholders involved, especially the Companies. Results of this inclusive monitoring strategy could save the Companies millions in the future, allowing them to target essential habitat restoration/mitigation and enhancement practices beneficial for future transmission line projects. However, if monitoring is not adequately funded, results will be lost and BLM will not be able to demonstrate that the Companies mitigation and enhancement investment was successful. Again, GEAS believes that results and information gathered from an efficient monitoring strategy can be very useful in demonstrating the Companies' corporate social responsibility and commitment to the public at large.	20000 - Monitoring, 35030 - Applicants' MEP (specific to NCA), 35040 - Recommendations for MEP changes
101306	9	3	GOLDEN EAGLE AUDUBON SOCIETY,MICHELE CRIST,SEAN FINN,ALISON LYON-HOLLORAN	S = Special Interest Group	QC complete	Conclusion The Companies state: "Though the Companies believe that the project does not have an adverse effect on raptor populations, including the raptor prey base, and that no enhancement should be required, in the spirit of cooperation offer this Draft MEP to allow the BLM to approve routes across the BOPNCA....." p. 18. We believe that this proposal does not demonstrate a "spirit of cooperation". This proposal saves the Companies millions of dollars in construction and yet they refuse to fund actual costs of mitigation and enhancement for the SRBOP NCA that Idahoans care deeply about. This statement indicates that the Companies have not read or understand the scientific literature demonstrating the effects of transmission lines and corridors across the United States. The scientific literature has demonstrated, over and over again, that transmission lines significantly fragment landscapes resulting in smaller patches of habitat, cause a direct loss of wildlife habitat, kill migrating birds, alter wildlife movements, are a conduit for invasive species , and are not desired near private lands because they significantly reduce property values.	25030 - Property Values, 27020 - Invasive Plants/weeds, 28000 - Wildlife (general), 28010 - Habitat Fragmentation, 28040 - Migratory Birds, 34010 - Private Land/Land Ownership, 35030 - Applicants' MEP (specific to NCA), 45000 - Literature Used/Not Used
101306	10	3	GOLDEN EAGLE AUDUBON SOCIETY,MICHELE CRIST,SEAN FINN,ALISON LYON-HOLLORAN	S = Special Interest Group	QC complete	Appendix A: Comments submitted to the Bureau of Land Management Resource Advisory Committee Gateway West Subcommittee Co-Chairs (February 2014) in response to the Mitigation and Enhancement Portfolio, Version 2, (dated 1/10/2014). General Comments: GEAS applauds Rocky Mountain Power and Idaho Power's (hereafter, 'the Companies') effort to work "in spirit of cooperation" to "meet enhancement requirements" (page 6) and the thoughtfulness the Companies have put forth for the need for remediation (i.e., habitat restoration component is scaled to the number of acres impacted during construction, page 35). The Portfolio indicates that the Enabling Legislation for SRBOP, Public Law 103-64, established the SRBOP in 1993 for the "...conservation, protection and enhancement of raptor populations and habitats and the natural and environmental resources and values associated therewith, and of the scientific, cultural, and educational resources and values...." Section 2(4) of the Act defines the term "raptor habitat" to include the habitat of the raptor prey base as well as the nesting and hunting habitat of raptors within the conservation area. Furthermore, it	35000 - NCA/SRBOP (general), 35030 - Applicants' MEP (specific to NCA), 35040 - Recommendations for MEP changes, 46000 - Refers to Previously Submitted Comments

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						references the 2008 SRBOP Resource Management Plan (RMP) indicating: "the SRBOP is managed by BLM under the concept of dominant use rather than multiple use. This means that prior to authorizing uses, BLM determines the compatibility of those uses with the purposes for which the NCA was established." Based on the Public Law and the RMP, the Portfolio states (Page 33, Sect. 8.2) that, "locating utilities within these (designated) corridors is consistent with the RMP and with the enabling legislation for the SRBOP and therefore should require no additional enhancement to be consistent with the enabling legislation." GEAS does not agree with this position. Degradation to raptor habitat as a result of powerline construction is not consistent with enabling legislation. Enhancement therefore is a required act to mitigate for reduction and damage to raptor habitat, not simply an in-kind act "in the spirit of cooperation". Further, it is the Companies responsibility as a direct economic beneficiary of the line installation to ensure – for the long-term – that raptor habitat is not degraded as a result of the powerline. The Portfolio correctly cites the SRBOP RMP stating, "to stabilize and increase the small mammal prey base, remnant upland native shrub must be preserved, interconnected and expanded (page 36)". Thus, to meet RMP objectives as well as operate in the spirit of cooperation, the Companies should be seeking to expand and inter-connect native vegetation in order to achieve objectives stated in the RMP. GEAS contends that the Companies are in a positive economic situation right now as they have saved significant expenses by routing Sections 8 and 9 through SRBOP – a decision GEAS vocally supported with comments submitted during the Final Environment Impact Statement comment period. The Companies saved substantial dollars by using SRBOP because the route covers fewer miles, there is less need to compensate private landowners, and there are minimal new road construction costs. Funding the restoration approach we propose is not out of the realm for the Companies and is in the Companies best interests to demonstrate their social responsibility and sustainability highlighted in their business plans and reports. Specific Comments and Recommendations The most critical component to long-term stability of the world-renowned raptor populations of SRBOP is maintenance and enhancement of native vegetation communities that support diverse, abundant prey bases for the raptors. Therefore, GEAS provides comments that can lead to the direct actions necessary to achieve habitat restoration and enhancement goals. GEAS proposes the use of an integrated and adaptive approach where restoration is applied. We contend that the habitat treatment success rates estimated in the Portfolio (80%) counters what restoration ecologists working in the SRBOP have found. The success of treatments in the precipitation and temperature zone occupied by SRBOP has very low restoration success for reseeding and other habitat enhancements using traditional approaches (M. Germino, D. Shinneman, and D. Pilliod, pers. comm.) due to SRBOP susceptibility to invasion by cheatgrass and accelerated fire cycle. Some habitat projects for the sole purpose of vegetation enhancement have actually increased the spread of cheatgrass. Work by Brooks and Chambers (2011) on resistance and resilience highlights the difficulties that must be confronted by restoration efforts in these dry, low elevation areas and represents the kind of science that should be understand before implementing a restoration plan in the SRBOP. Cheatgrass presence complicates these efforts. The invasion of cheatgrass has changed the fire frequency in sagebrush systems such as the SRBOP where, prior to cheatgrass invasions, fire occurred on average every 70 years. Cheatgrass presence has accelerated fire return intervals to 5 to 7 years, a drastic change that has completely altered habitat in the SRBOP and makes remnant stands of native	

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						vegetation a vital element of the long-term health of SRBOP and its ability to support raptors. Thus it is critical to first protect remnant sagebrush patches using firebreaks (i.e., forage kochia) as proposed by the BLM fuels experts (L Okeson, pers. comm.). As restoration activities progress, firebreaks may be modified (i.e., replaced with native vegetation to connect restored areas and planted around the newly restored and connected patches) to help ensure protection from future fire. Likewise, much effort has been expended on habitat enhancement in SRBOP, yet we know very little about what factors influence success and failure. GEAS proposes a restoration approach that is informed by ongoing research, designed to test and improve our knowledge as restoration is implemented, spatially explicit, and timed to appropriately capitalize on optimal weather conditions. Ongoing restoration research carried out by the NCA Restoration Working Group is well suited to inform the Companies restoration efforts as they develop new techniques and understand the importance of seasonal and annual timing of implementation as a key factors influencing success (M. Germino, D. Shinneman, and D. Pilliod, pers. comm.). The Work Group should be a key element of project planning and their published information and monitoring data should be employed as specific strategies are developed. Restoration initiated through the Enhancement and Mitigation Portfolio should start with these data in hand. Initial restoration plots should be placed and planted so they build upon and improve the research data, and bridge to application at larger spatial extents. That is, plots should be placed in areas that will eventually connect remnant native vegetation patches and seeded/planted in a range of treatments the Work Group research shows have higher success probabilities. This approach is critical to prepare for the second, larger application: because the actual restoration implementation must be timed with optimal weather, this "learn-do" approach will increase the likelihood of success when full implementation occurs. GEAS recommends that this restoration approach begin with the identification of the key remnant native sagebrush patches within the SRBOP that exhibit ecological integrity and are still "intact". These areas are the "base" for this type of approach. The second step would focus restoration efforts in areas between these key remnant patches in an effort to connect these key areas together. The overall goal of this approach is to eventually create ecologically intact, large, and connected sagebrush areas important for the many species that thrive in these conditions. The timing of restoration actions as specified above and success for restoration is dependent upon precipitation (large rain events) in the spring before restoration actions (planting, etc.) occur. It is imperative that restoration funds be flexible. Funds must be banked and allocated when the conditions are right for restoration actions. The restoration fund can be accessed when the conditions are prime for restoration actions. GEAS recommends the funding committed by the Companies be established as a Trust Fund which is managed by a Board or Oversight Committee. The Committee should have discretion to apply or reserve funding in a time-sensitive context (i.e, commit restoration funds in positive weather years). The Trust would serve a second function as a pot of 'matchable' dollars that could attract additional funds to augment restoration of SRBOPA. As restoration actions occur, monitoring must be implemented to quantify and understand where and why success rates are high, address challenges and failures, and allow for adapting the restoration approach over the years so that the dollars spent on restoration will be successful over the long-term. The Portfolio fails to specify a monitoring effort. This is an important aspect that must be addressed and is crucial to the success of this approach. If vegetation reestablishment is the goal, then appropriate	

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						vegetation monitoring protocols must be put in place with data collected both before and after construction on the line, within the key remnant sagebrush patches, and at sites designated for restoration and mitigation. Monitoring needs to be carefully considered and matched to expected outcomes temporally and ecologically. For example, restoration actions over a relatively small proportion of SRBOP are not likely to have measurable effects on, for example, prairie falcon populations across the entire SRBOP. It may, however, have some influence on nest success or breeding density of proximal nesting territories. Likewise, demographic response by prairie falcons may lag habitat recovery by several years. These examples illustrate the need for a thoughtful monitoring approach that begins with fine-resolution, vegetation monitoring and eventually scales to measuring the response by raptors that are most likely to be influenced by the restoration. The monitoring strategy should be implemented using an experimental design, where "control areas" and "experimental areas" are monitored so that comparisons can be made to determine successes, address failures, and inform late stage and future restoration actions accordingly. Again, this monitoring effort is critical to the adaptive restoration process and is required by BLM regulations. GEAS proposes action on an overall approach that meets the enabling legislation and RMP guidance, employs the best science while engaging the fuels expertise at BLM, and sets the stage for a more programmatic approach to habitat recovery in the SRBOP. Coordination between BLM land managers and ecologists, the Companies' natural resource and administrative specialists, and the NCA Restoration Working Group is critical to implement this approach. GEAS is committed to this collaborative, adaptive approach and pledges continued participation where appropriate. Additional Comments on Enhancement and Mitigation Recreational Shooting Although not directly addressed in the Portfolio, GEAS members are strongly in favor of a shooting closure within 200 yards of new and existing powerlines as well as access roads. A shooting closure is consistent with and supports a range of recommendations and offerings in the Portfolio. For example, the Portfolio indicates that, "access roads ... may increase the risk of vandalism ... (page 32)." A shooting ban of 200 yards from roads and powerlines would be enforceable (consistent with Law Enforcement provisions, page 37) and discourage both firearm-caused vandalism and additive mortality to raptors and prey. Furthermore, we contend that one of the greatest threats shooting brings to the SRBOP is the potential for fire ignition. There are numerous incidents of target-shooting-related fire ignitions in southwest Idaho, some of which sparked immense, destructive blazes. Wildfire is a recognized threat to native vegetation (and consequently small mammals and raptors) in the SRBOP and an economic threat to the powerlines. A shooting ban would reduce all of these threats and, when paired with increased law enforcement, is completely enforceable. Vegetation Restoration (reclamation) Regarding plant/seed mixtures: Page 36 states "mixes should include shrubs that are suitable for small mammals." While we don't argue with this intent, we expect that shrubs and forbs planted and seeded need to be a close match to the local soil and climate conditions... i.e., native plants. It's important this is clearly stated. Regarding the need for better (more accurate and precise) maps of proposed restoration: I.e., "... developing a geodatabase layer using the proposed facility locations and then overlaying that "footprint" database, whether for construction or operation footprint, with the relevant vegetation or land ownership geodatabase layer." GEAS recommends the restoration effort be fully informed with highly accurate spatial data and planning. SRBOP is one of the best-mapped areas in Idaho with a long history of spatial data. In	

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						preparation for spatial planning, the best available data on historic restoration activity and restoration research should be overlaid with topography, soils, fire perimeter and other GIS layers to ensure proper construction sighting, mitigation siting and restoration actions. Page 36: "in accordance with the RMP, habitat restoration projects should be located in areas where it is most beneficial to raptor prey populations" therefore a spatial component to the restoration exercise is essential. Need 'security' fund for fire response on top of management; page 32 cites a concern that "access roads ... may increase risk of vandalism, weed infestation, litter, etc." We feel that the increased risk of fire ignition is the most critical threat posed by increased access. Some 80% of fire ignitions in the NCA are human-caused (L. Okeson, pers. comm.). We agree, that access also means quicker response to fire ignition but we also know that fires expand rapidly. Therefore we suggest a dedicated effort to sign the areas regarding risks and costs of wildfire and a proactive effort to deter ignitions (including a firearm ban). Raptor nest/perch augmentation Proactive retrofitting is an important element especially to honor the intent of the NCA as a world-renown site for Birds of Prey (NCA not an end unto itself ... they are identified and situated for specific resource functions; SRBOP specifically designated for raptors, use for other purposes must be compatible with enhancements for BOP). GEAS recommends retrofitting existing structures where appropriate to enhance nest and perch sites for raptors. Leave structures on removed lines Page 39 and 40, referring to removal of Swan Falls to Bowmont line and Mountain Home to Bennet line: GEAS recommend the companies do not remove structures that are suitable for raptor and raven nest and perches. We recognize there may be safety considerations but recommend that all structures that are not deemed unsafe be left. In addition to opportunities for raptors and ravens, many cavity nesting (excavators and secondary) will benefit from the nest site opportunities. Furthermore, a wide variety of birds would benefit for the elevated perch opportunities. We recommend that cost savings of structure removal be redirected to (1) decommissioning and restoration of the service roads for these lines (thus improving and protecting slickspot peppergrass habitat), and (2) enhancements on the primary lines. GEAS recommends the Enhancement Portfolio reference using 'state of the art' guidelines to add desirable nest opportunities. Monitoring As stated above, monitoring needs to be a specific element of the Portfolio. GEAS recommends that the Portfolio references the BLM Assessment Inventory and Monitoring program and any local (i.e., NCA specific) monitoring protocols and specifically describes the need for targeted monitoring of vegetation response to restoration, small mammal population trend, and raptor response to nest and perch enhancement. Monitoring is best conducted under an experimental design so trials inform subsequent efforts and expenditures. Vegetation Page 36: ... "to stabilize and increase the small mammal prey base, remnant upland native shrub must be preserved, interconnected and expanded." Monitoring of upland native shrub is critical to measure success of restoration actions. Prey base Page 36: Citing the SRBOP RMP: the greatest benefit to raptors is in the stabilization of the prey base" thus no amount of restoration nor reclamation will meet RMP standards unless the prey base responds and the only way to accurately test this is through monitoring of the prey populations themselves. Raptors Monitoring protocols should be put in place to understand the effects of the line and help target measures to address any negative impacts through further management action. Ultimately enhancement measures should improve or at least maintain current population numbers in the area. Again, Golden Eagle Audubon Society Board of Directors appreciates this opportunity	

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						to comment on the Gateway West Enhancement and Mitigation Portfolio. We look forward to further engagement in successful siting of the Gateway West line in SRBOP and in successfully enhancing native vegetation, small mammal, and raptor communities in southwest Idaho. On behalf of the Golden Eagle Audubon Society Board of Directors, Sean Finn Conservation Committee Chair	
101351	1	1	L CLARK OLSEN	I = Individual (s) not affiliated	QC complete	I agree with the proposed route for segment 8 as proposed by RAC.	50010 - Segment 8 – Applicants' Proposed Route
101351	2	1	L CLARK OLSEN	I = Individual (s) not affiliated	QC complete	I do not agree with any plan to route the transmission line thru farms, dairies & other private land near Kuna & Melba. I have seen how transmission lines in other states have disrupted private land / property and we don't need a line running thru private properties the proposed route is the best alternative if we have to have any choice in the matter.	25060 - Agriculture, 34010 - Private Land/Land Ownership, 37000 - Agriculture (includes crop production, dairies, cattle feedlots, and grazing)
101352	1	1	TIM FONTAINE	I = Individual (s) not affiliated	QC complete	Looking at other routes is not needed. Segment 8 route I approve please don't change the route from NCA area.	50010 - Segment 8 – Applicants' Proposed Route
101354	1	1	KASPER LAND CATTLE LLC,TOM KASPER	I = Individual (s) not affiliated	QC complete	My concern is the location of Segment 8. We have a dairy operation located North of the Snake River in Melba close to Celebration Park. The proposed location of the second row of power lines will be 905 feet from the cow corral steel fence. My question is what impact the dairy operation would receive from a high voltage power line. Will the high voltage affect dairy cows dry matter feed consumption, lower milk production, milk quality, behavior, and conception rates> If the power lines do come close to the dairy operation, I would then have to record and take measurements of the previously mentioned concerns prior to the newly installed power lines is charged. Another concern is what affect high voltage would have on the milk barn equipment. We have several sensitive electronic computer controlled mechanical operation of the micro switches. Our diary is a 24/7/365 constant operation. Any impact to the dairy operation would be economically severe.	20000 - Monitoring, 25000 - Socioeconomics, 25060 - Agriculture, 37000 - Agriculture (includes crop production, dairies, cattle feedlots, and grazing), 40000 - Electrical Environment, 50010 - Segment 8 – Applicants' Proposed Route
101354	2	1	KASPER LAND CATTLE LLC,TOM KASPER	I = Individual (s) not affiliated	QC complete	Another concern is the location of a second power line close to Celebration Park. Even though the proposed second power line will be located just north of the existing power line, it still is quite visual to the public at the Park. One power line can be ignored put a second line would give a negative industrial look. I would think that kind of perception would take away the wilderness concept from the public minds if there were to happen. A lot has been invested in this park and it is visited by large groups weekly.	23000 - Visual Resources, 34040 - Wilderness/Wild and Scenic Rivers , 36000 - Recreation
101355	1	1	RALPH CLAYTON	I = Individual (s) not affiliated	QC complete	Please do not change the route from the NCA. There is no need to look at other routes and I approve the proposed Segment 8 route that the RAC has proposed.	50010 - Segment 8 – Applicants' Proposed Route
101356	1	1	KENNETH WIRZ	I = Individual (s) not affiliated	QC complete	There is no need to look at other routes. I approve the proposed segment 8 route that the RAC has proposed. Please do not change the route from the NCA.	50010 - Segment 8 – Applicants' Proposed Route
101357	1	2	JAMES GOULD,JOYCE GOULD	I = Individual (s) not affiliated	QC complete	We strongly recommend the proposed Segment 8 route recommended by the RAC, the Regional Advisory Committee. Thousands of dollars and a multitude of man hours were spent in reviewing many routes. They concluded the best route was through NCA proposed location. PLEASE DO NOT CHANGE THE ROUTE FROM THE NCA.	50010 - Segment 8 – Applicants' Proposed Route
101361	1	1	LYONS DEVELOPMENT, LLC,BARTON FRED LYONS	I = Individual (s) not affiliated	QC complete	There is no need to look at new routes and I approve the proposed segment 8 route that the Regional Advisory Committee has proposed. RAC has spend hundred of hours and thousand of dollars on the proposal. Please do not deviate from their proposed route through the NCA.	50010 - Segment 8 – Applicants' Proposed Route
101303	1	3	IDAHO CONSERVATION LEAGUE,THE WILDERNESS SOCIETY,CONSERVATION LANDS FOUNDATION,NADA CULVER,DANIELLE MURRAY,JOHN ROBISON	S = Special Interest Group	QC complete	During the Supplemental EIS process, BLM must consider all the route options submitted by the subcommittee. The BLM cannot be biased towards an option or else the EIS would become a "foreordained formality" and not meet the requirements of NEPA. In order to avoid any question of bias during the SEIS process, the BLM should not give undue weight to the routes recommended	10000 - Conformance with the NEPA process, 15000 - Comparison of Alternatives, 35000 - NCA/SRBOP (general), 50030 - Segment 8 – RAC Route Options, 51030 - Segment 9 – RAC Route Options

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						by the subcommittee. The subcommittee identified a dozen or more routes and segments of routes that could be pieced together to meet the proponent's needs that are outside the NCA. BLM must equally consider these viable routes.	
101303	2	3	IDAHO CONSERVATION LEAGUE,THE WILDERNESS SOCIETY,CONSERVATION LANDS FOUNDATION,NADA CULVER,DANIELLE MURRAY,JOHN ROBISON	S = Special Interest Group	QC complete	The BLM has a legal requirement to manage the NCA for the "protection, maintenance, and enhancement of raptor populations and habitats" and "the natural and environmental resources and values associated therewith, and of the scientific cultural, and educational resources and values" (16 U.S.C 460iii-3(b)(7)). Secretarial Order 3308 further expounded on these conservation standards by stating, "BLM shall ensure that the components of the [National Conservation Lands] are managed to protect the values for which they were designated, including, where appropriate, prohibiting uses that are in conflict with those values." To be a viable option, the BLM must show that the siting, construction and maintenance of a transmission line through the NCA protects, maintains or enhances: 1) raptor populations and habitat; and 2) natural, environmental, scientific, cultural and educational resources and values.	24000 - Cultural Resources, 28020 - Raptors/Eagles/Ravens, 35000 - NCA/SRBOP (general), 35010 - Enhancement requirements
101303	3	3	IDAHO CONSERVATION LEAGUE,THE WILDERNESS SOCIETY,CONSERVATION LANDS FOUNDATION,NADA CULVER,DANIELLE MURRAY,JOHN ROBISON	S = Special Interest Group	QC complete	In 2012, the BLM released Policy Manual 6220, which set specific guidance for BLM concerning the granting of new rights-of-way through units of the National Conservation Lands. In fact, it creates a presumption the BLM will not approve new rights-of-ways in National Monuments and National Conservation Areas. The manual states: "To the greatest extent possible, subject to applicable law, the BLM should through land use planning and project-level processes and decisions, avoid designation or authorizing use of transportation or utility corridors within Monuments an NCAs. To that end, and consistent with applicable law, when developing or revising land use plans for Monuments and NCAs, the BLM will consider" a. Designating the Monument or NCA as an exclusion or avoidance area; b. Not designating any new transportation or utility corridors with the Monument or NCA if the BLM determines that the corridor would be incompatible with the designating authority or the purposes for which the Monument or NCA was designated; c. Relocating any existing designated transportation and utility corridors outside the Monument or NCA. The BLM must apply its own policy and the appropriate standards when considering siting segment 8 and 9 of the Gateway Transmission Line.	12000 - Relationships to other federal laws and policies, 34030 - Federal land Use Plans, 35000 - NCA/SRBOP (general), 50000 - Segment 8 General, 51000 - Segment 9 – General
101303	4	3	IDAHO CONSERVATION LEAGUE,THE WILDERNESS SOCIETY,CONSERVATION LANDS FOUNDATION,NADA CULVER,DANIELLE MURRAY,JOHN ROBISON	S = Special Interest Group	QC complete	In our view, the proponents suggested Mitigation and Enhancement Portfolio is wholly inadequate and based on erroneous and misleading assumptions. We agree with the section of comments submitted by subcommittee co-chair Karen Steenhof that pertain to the inadequacy of the Portfolio and the proponent's mischaracterization of impacts on the NCA. The Portfolio must more thoroughly, meaningfully and effectively address the impacts to the resources of the NCA. Mitigation and enhancement efforts need to be in effect as long as the impacts of the transmission line are present. We would also note that a mitigation and enhancement portfolio should not be considered until BLM has shown that siting, building and maintaining a transmission line cannot be otherwise routed and will ultimately protect and enhance the resources and values of the NCA.	35010 - Enhancement requirements, 35020 - Mitigation suggestions, 35030 - Applicants' MEP (specific to NCA), 35040 - Recommendations for MEP changes, 46000 - Refers to Previously Submitted Comments
101303	5	3	IDAHO CONSERVATION LEAGUE,THE WILDERNESS SOCIETY,CONSERVATION LANDS FOUNDATION,NADA CULVER,DANIELLE MURRAY,JOHN ROBISON	S = Special Interest Group	QC complete	Effects on Sage GrouseThe siting of Segments 8 & 9 requires BLM to balance several conflicting policies and interests; BLM is required to evaluate impacts, mitigation and protection opportunities for a variety of resources on both public and private land. We are particularly concerned about the impacts to sage grouse. The U.S. Fish and Wildlife Service has found the greater sage	19000 - Mitigation (general), 28070 - Sage-grouse, 46000 - Refers to Previously Submitted Comments

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						grouse warrants protection under the Endangered Species Act. During the SEIS process, the BLM should consider avoiding, minimizing and mitigating harmful, and potentially irreversible impacts to sage grouse. (Please refer to an October 12, 2012 Letter, submitted by The Wilderness Society, Idaho Conservation League, The Nature Conservancy in Idaho and the Conservation Lands Foundation).	
101310	1	1	US ENVIRONMENTAL PROTECTION AGENCY, REGION 10,ERIK PETERSON	G = Government	QC complete	We continue to believe that the EIS should include a discussion of who would manage the In-Lieu Fee (ILF) for this project's unavoidable aquatic resource impacts. We also continue to believe that the EIS should discuss reasons why an ILF would be the appropriate approach. We recommend that the BLM obtain a status update for this project's Clean Water Act Section 404 compensatory mitigation efforts from the Corps of Engineers and provide related information in the SEIS. An update on mitigation efforts for aquatic resources would help to ensure that project impacts on Segments 1-7 and 10 are consistent with the 2013 Final EIS.	18000 - Comments on segments 1 to 7 & 10, 19000 - Mitigation (general), 27030 - Wetlands/Riparian vegetation, 33000 - Water Resources and Use, 46000 - Refers to Previously Submitted Comments
101310	2	1	US ENVIRONMENTAL PROTECTION AGENCY, REGION 10,ERIK PETERSON	G = Government	QC complete	With regard to siting constraints, we continue to believe that flexibility in setting transmission line separation distances can help reduce impacts to sensitive resources. We are pleased to see the BLM's and the applicants' efforts to utilize smaller common corridors and opportunities to "double circuit" new and existing transmission lines. We agree that these are useful techniques for reducing the physical and visual footprint of new lines.	23000 - Visual Resources, 48000 - Design Features
101310	3	1	US ENVIRONMENTAL PROTECTION AGENCY, REGION 10,ERIK PETERSON	G = Government	QC complete	We reiterate that both the EPA and the BLM have also recommended consistent application of Environmental Protection Measures on federal and non-federal lands to the applicants. We also understand that the BLM cannot require the implementation of protective measures on non-federal land. To address our ongoing interest in consistent application of protection measures, we recommend that the SEIS include updated information on which Environmental Protection Measures will apply to federal and non-federal lands. Where Environmental Protection Measures only apply to one land ownership type, implications for different environmental impacts should he disclosed in the EIS.	34010 - Private Land/Land Ownership, 50000 - Segment 8 General, 51000 - Segment 9 – General
101310	4	1	US ENVIRONMENTAL PROTECTION AGENCY, REGION 10,ERIK PETERSON	G = Government	QC complete	Mitigation and Enhancement Portfolio Proposal and Boise District Resource Advisory Committee Similar to our 2011 comments on the Draft EIS and our 2013 comments on the Final EIS, we commend the BLM, cooperating agencies, and the proponents for your planning efforts on this project. The Morley Nelson Snake River Birds of Prey National Conservation Area DRAFT Mitigation and Enhancement Portfolio Proposal and the Boise District Resource Advisory Council Subcommittee Report on Gateway West Segments 8 and 9 Route Options In or Near the Morley Nelson Snake River Birds of Prey National Conservation Area are evidence of substantial and effective planning efforts. In terms of comparing environmental impacts from alternatives, the SEIS should address each alternative's environmental impacts with consideration of mitigation enhancement proposals.	35030 - Applicants' MEP (specific to NCA)
101304	1	1	CONNIE HOLLOWAY	I = Individual (s) not affiliated	QC complete	I am writing this letter once again as I am very concerned about the route selection for segment 9 , specifically Alternative 9E, of the Gateway West Transmission Project. I am concerned for how it would ruin our eastern Owyhee front , a place of beauty and awe. I am also concerned for the Greater Sage Grouse , I think already listed as an threatened species and how the impact of 9E would have on their survival.	23000 - Visual Resources, 28070 - Sage-grouse, 51020 - Segment 9 – Routes considered in the 2013 FEIS
101304	2	1	CONNIE HOLLOWAY	I = Individual (s) not affiliated	QC complete	I would like to say I support the proposed Segment 9 Alternative through the Snake River Birds of Prey National Conservation Area. I think it is marked 9D/F/G/H on the project map. There are already existing power lines, and I firmly believe we should not pollute any more of our beautiful open spaces	51010 - Segment 9 – Applicants' Proposed Route, 48000 - Design Features

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						with these power towers and keep them sharing similar corridors whenever possible.	
101304	3	1	CONNIE HOLLOWAY	I = Individual (s) not affiliated	QC complete	I have also been told by my friend Dale Herter a expert ornithologist and Karen Steenhof that this route through the Birds of Prey would actually benefit the raptors , giving them more places to perch and hunt.	28020 - Raptors/Eagles/Ravens, 35000 - NCA/SRBOP (general)
101304	4	1	CONNIE HOLLOWAY	I = Individual (s) not affiliated	QC complete	I am happy that the Companies have adopted the Resource Advisory Council (RAC) subcommittee's recommended routes as their proposed action. By avoiding private land and sage-grouse habitat, these routes minimize conflicts with people and resources .	28070 - Sage-grouse, 34010 - Private Land/Land Ownership, 51010 - Segment 9 – Applicants' Proposed Route
101304	5	1	CONNIE HOLLOWAY	I = Individual (s) not affiliated	QC complete	.I am disappointed that the Companies did not adopt the RAC subcommittee's May 30, 2014 recommendations about the Mitigation and Enhancement Portfolio in their August revision of that document. The proposed routes will not be acceptable to BLM and Conservation Lands advocates if they are not accompanied by a substantive and meaningful plan to mitigate and enhance resources and values within the Morley Nelson Snake River Birds of Prey Area. The Companies have not demonstrated that their plan will create a net benefit to the BOPNCA relative to current conditions, and the August version of the plan appears insufficient to meet the enhancement requirements of the enabling legislation. I strongly urge the BLM and the Companies to re-consider the RAC subcommittee comments on the Enhancement package. The May 30 report identifies deficiencies in the plan that still have not been addressed, and it recommends actions that have not been included in the revised plan. The Companies and BLM have invested a great deal of time and money in this project, and it appears they have finally gotten public support for feasible, proposed routes. However, the proposed routes will be dead on arrival if the Companies don't invest more in constructive and effective mitigation and enhancement. Please don't let an insufficient enhancement plan stop the progress that has been made thus far.	12000 - Relationships to other federal laws and policies, 35010 - Enhancement requirements, 35020 - Mitigation suggestions, 35030 - Applicants' MEP (specific to NCA), 46000 - Refers to Previously Submitted Comments
101305	1	1	BLM RAC SUBCOMMITTEE,KAREN STEENHOF	I = Individual (s) not affiliated	QC complete	I am very happy that the Companies have adopted the Resource Advisory Council (RAC) subcommittee's recommended routes as their proposed action. By avoiding private land and sage-grouse habitat, these routes minimize conflicts with people and resources	28070 - Sage-grouse, 34010 - Private Land/Land Ownership, 50010 - Segment 8 – Applicants' Proposed Route, 51010 - Segment 9 – Applicants' Proposed Route
101305	2	1	BLM RAC SUBCOMMITTEE,KAREN STEENHOF	I = Individual (s) not affiliated	QC complete	However, I am very disappointed that the Companies did not adopt the RAC subcommittee's May 30, 2014 recommendations about the Mitigation and Enhancement Portfolio in their August revision of that document. The proposed routes will not be acceptable to BLM and Conservation Lands advocates if they are not accompanied by a substantive and meaningful plan to mitigate and enhance resources and values within the Morley Nelson Snake River Birds of Prey National Conservation Area (BOPNCA). The Record of Decision issued by the BLM in November 2013 called upon BLM to evaluate and refine the Mitigation and Enhancement plan to ensure that it is sufficient to meet the enhancement requirements of the legislation that designated the BOPNCA. To authorize a right-of-way (ROW) under the Federal Land Policy and Management Act (FLPMA) through any portion of the BOPNCA, the BLM is charged with demonstrating that an enhancement program will result in a net benefit to the BOPNCA for the duration of the permit (PL 103-64). The Companies have not demonstrated that their plan will create a net benefit to the BOPNCA relative to current conditions, and the August version of the plan appears insufficient to meet the enhancement requirements of the enabling legislation.	10000 - Conformance with the NEPA process, 12000 - Relationships to other federal laws and policies, 35030 - Applicants' MEP (specific to NCA), 35040 - Recommendations for MEP changes
101305	7	1	BLM RAC SUBCOMMITTEE,KAREN STEENHOF	I = Individual (s) not affiliated	QC complete	Page 34. I am glad that the Companies recognize that new roads will result in increased public access to parts of the BOPNCA. In addition, to increasing vandalism, weed spread, and litter, the roads will likely increase the incidence of recreational shooting. If BLM cannot close roads to shooting, then the	27020 - Invasive Plants/weeds, 28020 - Raptors/Eagles/Ravens, 35000 - NCA/SRBOP (general), 36000 - Recreation, 38000 - Transportation

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						Companies should fund studies of the effects of recreational shooting on raptor and prey populations as well as the extent of lead in the BOPNCA environment, as proposed by the Subcommittee.	
101305	8	1	BLM RAC SUBCOMMITTEE,KAREN STEENHOF	I = Individual (s) not affiliated	QC complete	Page 40. The relevance of the discussion of livestock effects on riparian areas is unclear as the proposed routes will be affecting few if any wetland areas.	27030 - Wetlands/Riparian vegetation, 35030 - Applicants' MEP (specific to NCA)
101305	9	1	BLM RAC SUBCOMMITTEE,KAREN STEENHOF	I = Individual (s) not affiliated	QC complete	Page 47. The Companies' failure to commit to installation of artificial nesting platforms is very discouraging. During RAC subcommittee meetings, U.S. Fish and Wildlife Service staff committed to agreeing to nest site enhancements on power line structures. It is essential that biologists and engineers work together before line construction to come up with tower modifications (including nest platforms) that benefit raptors and deter ravens. It would be wrong to defer this critical task to the Oversight Committee. At a minimum, the Companies should support monitoring of raptor nesting density and productivity on the existing lines that the new lines will parallel and replace both before and after new construction.	28020 - Raptors/Eagles/Ravens, 35030 - Applicants' MEP (specific to NCA), 48000 - Design Features
101305	10	1	BLM RAC SUBCOMMITTEE,KAREN STEENHOF	I = Individual (s) not affiliated	QC complete	I have some additional suggestions for the Mitigation and Enhancement Portfolio that the Companies and BLM should consider. First, the tubular metal Poles proposed for supporting the double-circuited portion of Segment 9 will likely be unattractive to raptors for perching and nesting. I suggest that the Companies leave and maintain the structures supporting the existing 138-kV line that the new line would replace. Some of these structures already support artificial platforms used by raptors for nesting. I suggest that the Companies install additional nesting platforms on structures to achieve a density of approximately 1 platform per kilometer within the BOPNCA. Metal artificial platforms similar to those on the existing 500-kV line should be constructed on some of the new lattice towers within the BOPNCA. Where the new line will parallel the existing 500-kV line, new platforms should be staggered with existing transmission tower platforms (Miles 96, 104, 109, 111, 113) to achieve a density of approximately 1 platform per 2.5 miles within the BOPNCA. Pre- and post-construction monitoring of raptor and raven nesting and productivity should be used to evaluate the effectiveness of these efforts. Second, there may be an opportunity to enhance habitat on the private land in Canyon County that the new transmission line is proposed to traverse. Golden Eagles nested on Tower 119/3 of the existing transmission line from 1983 to 2004 but not since 2004. Changing agricultural practices and disturbance associated with farming activities might have been responsible for eagles abandoning the site. I suggest the Companies consider agreements with the landowner that would involve habitat restoration (possibly with the aid of irrigation) and a reduction in disturbance that might attract eagles back to this area. Finally, as noted in earlier NEPA documents, construction activities could cause raptor nest failure or abandonment. I was unable to find proposed timing restrictions on construction in either the enhancement package or the plan of development, so I was unable to verify if the Companies have committed to any specific timing restrictions on construction within the BOPNCA. I suggest that the mitigation/enhancement plan clearly state any timing restrictions for each raptor species. Timing restrictions on construction near raptor nests, particularly those on existing transmission lines, should apply to the complete nesting season: courtship through post-fledging. The post-fledging period is one of the most critical for raptors. It would be inappropriate to lift protection as soon as young fledge. It is also important to avoid construction in occupied territories just prior to egg-laying, when raptors are especially sensitive to disturbance.	20000 - Monitoring, 28020 - Raptors/Eagles/Ravens, 35020 - Mitigation suggestions, 35030 - Applicants' MEP (specific to NCA), 35040 - Recommendations for MEP changes, 46000 - Refers to Previously Submitted Comments, 48000 - Design Features

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101360	1	1	ELVIN LEO & UNA CLOYD	I = Individual (s) not affiliated	QC complete	In the past years working at Idaho Power and talking several times with Mr. Morley Nelson as they worked very close on the Birds of Prey Area, I feel he would agree the propose route would be the one to use. And I agree it would not involve devaluing us land owners property. My home on a small lot would kill us. Thank you for going the new red proposed route.	25030 - Property Values, 34010 - Private Land/Land Ownership, 50010 - Segment 8 – Applicants' Proposed Route, 51010 - Segment 9 – Applicants' Proposed Route
101368	1	1	PEGGY FRIDDLE	I = Individual (s) not affiliated	QC complete	I am not in favor of the lines coming through the proposed Segment 8 Route	50010 - Segment 8 – Applicants' Proposed Route
101368	2	1	PEGGY FRIDDLE	I = Individual (s) not affiliated	QC complete	My family owns a farm that has been in the family since the early 1940's and putting another larger line 250 feet north of the excitisting one would just ruin several acres of farming acres plus causing a substantial devaluation of the farm.	25030 - Property Values, 25060 - Agriculture, 34010 - Private Land/Land Ownership, 37000 - Agriculture (includes crop production, dairies, cattle feedlots, and grazing)
101368	3	1	PEGGY FRIDDLE	I = Individual (s) not affiliated	QC complete	Reports are by putting the lines South would ruin the habit of the Birds of Prey area. We have noticed the last few years ever so many birds that you would say their habit is south across the Snake River now are all around farms on the North side of the river. As I recall years ago in Washington State the logging companies had to stop logging in many areas for the environments said it was destroying the habit of the White Owl. It was later discovered that the White Owl just moved to another area and very successfully continued to live and produce like always. The desert has been so dry for the last few years that is why we attribute the increase of all the hawks and occasionally Eagles in our fields for with the green vegetation come the rodents and smaller birds that these Birds of Prey feed on. The Canyon County Noxious Weed & Gopher Control have made and placed 110 large bird houses on twelve foot high poles on farms and known nesting places to entice large birds to use as nesting houses.	28020 - Raptors/Eagles/Ravens, 35000 - NCA/SRBOP (general)
101370	1	2	LONNIE AND LYNNE SVEDIN	I = Individual (s) not affiliated	QC complete	We fully support the proposed segment 8 route that the Regional Advisory Committee has proposed. THis committee has spent many hours + thousands of dollars on deciding which route would best suit the BLM birds of prey, + the community of Melba / Kuna, + we fully support their final decision. Please do not change the route from the Morley Nelson Birds of Prey	50010 - Segment 8 – Applicants' Proposed Route
101358	1	1	DUEY JOHNS	I = Individual (s) not affiliated	QC complete	I support the proposed sitting of the Power line going thru Strike Dam and the Birds of Prey. and back into Owyhee County to the substation.	50010 - Segment 8 – Applicants' Proposed Route, 51010 - Segment 9 – Applicants' Proposed Route
101358	2	1	DUEY JOHNS	I = Individual (s) not affiliated	QC complete	The enhancement Fund should mostly go to habitat restoration along the Powerline route. The amount suggested for police protection is asinine, unless we now need 24 hours surveillance.	35030 - Applicants' MEP (specific to NCA)
101359	1	1	ELIZABETH MATHEWS	I = Individual (s) not affiliated	QC complete	These lines should go where existing lines are currently, not across private lands in Owyhee County!	34010 - Private Land/Land Ownership, 50000 - Segment 8 General, 51000 - Segment 9 – General, 48000 - Design Features
101322	1	1	SCOTT NICHOLSON	I = Individual (s) not affiliated	QC complete	I agree with route 8	50000 - Segment 8 General
101323	1	1	TOM NICHOLSON	I = Individual (s) not affiliated	QC complete	For me the proposed Segment 8 route is by far the best route of all proposed. Please approve this route as soon as possible.	50010 - Segment 8 – Applicants' Proposed Route
101324	1	1	C C & T LAND AND CATTLE,SCOTT NICHOLSON	I = Individual (s) not affiliated	QC complete	I would agree with route 8 + 9 would be the best route to go with.	50000 - Segment 8 General, 51000 - Segment 9 – General
101325	1	1	E KEITH HOAGLAND	I = Individual (s) not affiliated	QC complete	We need the farm ground to feed the people.	25060 - Agriculture, 34010 - Private Land/Land Ownership
101362	1	1	JAMES W BURCH	I = Individual (s) not affiliated	QC complete	I strongly agree with the recommendation of the Boise District Resource Advisory Council regarding the proposed segment 8 route for the powerline. I respectfully request that the proposed location of the routing through the Birds of Prey Area for Segment 8 be honored.	50010 - Segment 8 – Applicants' Proposed Route
101288	6	1	MERRI MELDE	I = Individual (s) not affiliated	QC complete	the excuse that you can't run 2 power lines too close together in the NCA is bogus, since if you drive along I-84 in Oregon, you see no less than 5 power lines running parallel within a quarter mile of each other.	48000 - Design Features

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101286	1	2	TYLER RISEN,DEBBIE RISEN	I = Individual (s) not affiliated	QC complete	we approve of this proposed route through the Morley Nelson Birds of Prey NCA. We attended numerous meetings on the routing of Segment 8, which was originally proposed to run through our property next to our house. This would have been a financial disaster for us due to the negative effect on our property value (and probably on our health). The RAC has spent hundreds of hours and thousands of dollars reviewing the various routes and concluded that the best location would be to route Segment 8 through the NCA. Furthermore, the NCA already has similar power lines running through it. There is no evidence that these lines have affected wildlife in the NCA, but the effect on people who like us who live and own property along the previously proposed routes through private land would be devastating. PLEASE DO NOT CHANGE THE SEGMENT 8 ROUTE AWAY FROM THE NCA.	25030 - Property Values, 28000 - Wildlife (general), 34010 - Private Land/Land Ownership, 35000 - NCA/SRBOP (general), 41000 - Public Safety, 50010 - Segment 8 – Applicants' Proposed Route, 50020 - Segment 8 – Routes considered in the 2013 FEIS
101365	1	1	BEVERLY MORRIS	I = Individual (s) not affiliated	QC complete	WE are strongly for routing Segment 8 through Morley Nelson Birds of Prey - NCA. There is no need to look at any other routes and we approve the proposed Segment 8 route that the Regional Advisory Committee (RAC) has proposed. The RAC has spent hundred of hours and thousands of dollars in reviewing various routes and concluded on the proposed location trough the NCA. PLEASE DO NOT CHANGE THE ROUTE FROM THE NCA!	50010 - Segment 8 – Applicants' Proposed Route
101363	1	1	SAMUEL ALLDREDGE	I = Individual (s) not affiliated	QC complete	Please do not change The Route from the NCA. The BLM Preferred Alternative or Deferred Decision Route is not what I would like to see happen. It runs to close to Kuna and our subdivision at Kuna Mora and Cloverdale. The Arrow Rock subdivision.	25020 - Housing, 50010 - Segment 8 – Applicants' Proposed Route, 50020 - Segment 8 – Routes considered in the 2013 FEIS, 51010 - Segment 9 – Applicants' Proposed Route, 51020 - Segment 9 – Routes considered in the 2013 FEIS
101364	1	1	RONALD MCMURRAY	I = Individual (s) not affiliated	QC complete	Do not change the route from the NCA. There is no need to look at other routes.	50010 - Segment 8 – Applicants' Proposed Route, 51010 - Segment 9 – Applicants' Proposed Route
101366	1	1	ALICE & PAUL PLINE	I = Individual (s) not affiliated	QC complete	We totally agree with BLM decision to run the powerline on non irrigated ground 200 years from now people will thank you for your foresight to have [illegible].Run cattle & sheep on BLM ground - it is renewable resource, a tax base, fire prevention. Birds of prey only go where there is food + water, therefore we have them on our private cultivated ground 90% of the time.	25060 - Agriculture, 28020 - Raptors/Eagles/Ravens, 50010 - Segment 8 – Applicants' Proposed Route, 51010 - Segment 9 – Applicants' Proposed Route
101367	1	1	BLACKSCREEK LIMITED PARTNERSHIP	B = Business or Business Group	QC complete	Route #8 is the only logical route of all the proposals. Please approve this route immediately.	50000 - Segment 8 General
101339	1	2	LEE V & JANICE D HUMPHREY	I = Individual (s) not affiliated	QC complete	I would like to see Idaho Power Expand and refocus their portfolio to meet guidelines recommended by the sub committee. I would also like to know why they did not accept these recommendations, for the mitigation and enhancement plan. I would also like to know if BLM thinks that the proposed recommended enhancement is adequate enough to meet the legislative requirements.	35010 - Enhancement requirements, 35030 - Applicants' MEP (specific to NCA), 35040 - Recommendations for MEP changes
101339	2	2	LEE V & JANICE D HUMPHREY	I = Individual (s) not affiliated	QC complete	I fully support keeping all routes "off" of privately owned lands in Owyhee County.	34010 - Private Land/Land Ownership, 34011 - Site the line on public land, 50000 - Segment 8 General, 51000 - Segment 9 – General
101348	1	1	LEE V & JANICE D HUMPHREY	I = Individual (s) not affiliated	QC complete	I fully commend Idaho Power and Rocky Mountain Powers decision to accept the route proposed by the RAC subcommittee. But why didn't they accept their (RAC) recommendations about the mitigation and enhancement plans. Idaho Power needs to re-focus and expand their portfolio to meet the recommendations made by the RAC sub - committee.	35030 - Applicants' MEP (specific to NCA), 35040 - Recommendations for MEP changes
101348	2	1	LEE V & JANICE D HUMPHREY	I = Individual (s) not affiliated	QC complete	Also does BLM think that the legislative requirements will be met by the proposed enhancement.	35010 - Enhancement requirements
101348	3	1	LEE V & JANICE D HUMPHREY	I = Individual (s) not affiliated	QC complete	I fully support the proposed route made by the RAC sub-committee. This keeps all routes off of privately - owned land on Owyhee County.	34010 - Private Land/Land Ownership, 34011 - Site the line on public land, 50010 - Segment 8 – Applicants' Proposed Route, 51010 - Segment 9 – Applicants' Proposed Route

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101349	1	1	GORDON L & NANCY A THOMPSON	I = Individual (s) not affiliated	QC complete	I believe the latest revised proposed routes for segments 8 & 9 to be the best route. All parties involved have been [illegible] in determining the best routes, therefore this is the best route for everyone.	50010 - Segment 8 – Applicants' Proposed Route, 51010 - Segment 9 – Applicants' Proposed Route
101349	2	1	GORDON L & NANCY A THOMPSON	I = Individual (s) not affiliated	QC complete	There are [illegible] in the NCA. [illegible]	35000 - NCA/SRBOP (general)
101349	3	1	GORDON L & NANCY A THOMPSON	I = Individual (s) not affiliated	QC complete	The new proposed route, at the [illegible] would provide much less [illegible] the sage grouse than the previous routes would [illegible]. There is a [illegible] in favor of the new proposed routes.	28070 - Sage-grouse
101334	1	1	DALE BABBITT	I = Individual (s) not affiliated	QC complete	There is no need to look at any other routes and I approve the proposed segment 8 route that the Regional Advisory Committee (RAC) has proposed	50010 - Segment 8 – Applicants' Proposed Route
101335	1	1	BASIN FERTILIZER AND FEED,ERIC CHILD	I = Individual (s) not affiliated	QC complete	I do not see any need to look at any other routes and I approve the proposed segment 8 route that the REgional Advisory Committee ahs proposed. The RAC has spend hundred of hours and thousands of dollars in reviewing various routes and concluded on the proposed location through th eNCA. And I would ask that you do not change the route from the NCA.	50010 - Segment 8 – Applicants' Proposed Route
101336	1	1	C T PROPERTIES LLC,ROBINSON R I HONEY CO INC,RICHARD C WILLIAMS	I = Individual (s) not affiliated	QC complete	I do not see any need whatsoever to look at any other routes, I do strongly approve the proposed Segment 8 route that the Regional Advisory Council (RAC) has proposed. They have spent countless hours and dollars in reviewing the alternative routes and have concluded the proposed location through the NCA. It is strongly requested you DO NOT change the route from the NCA. This route will eliminate millions of dollars of economic damage to our great state if prior alternative routes were selected.	25000 - Socioeconomics, 50010 - Segment 8 – Applicants' Proposed Route, 58000 - General project effects on State (Idaho)
101337	1	1	PATSY ANDERSON	I = Individual (s) not affiliated	QC complete	The proposed route of the transmission line between mileposts 35 to 42 is more reasonable than the older route proposed due to the following reasons: 1) The route will not interfere with the Historic Old Oregon Trail + surrounding area rated VRM II.	23000 - Visual Resources, 24010 - Historic Trails, 50020 - Segment 8 – Routes considered in the 2013 FEIS
101337	2	1	PATSY ANDERSON	I = Individual (s) not affiliated	QC complete	The proposed route of the transmission line between mileposts 35 to 42 is more reasonable than the older route proposed due to the following reasons: 2) The present route is more direct with fewer corner towers, which are more expensive to install.	25000 - Socioeconomics
101337	3	1	PATSY ANDERSON	I = Individual (s) not affiliated	QC complete	The proposed route of the transmission line between mileposts 35 to 42 is more reasonable than the older route proposed due to the following reasons: 3)The installation of the towers would be easier to accomplish without having to traverse canyons and undulating land associated with these. Roadway emplacement for access to erect transmission line structure and maintenance and upkeep would be easier.	31000 - Geologic Hazards, 34000 - Land Use, 38000 - Transportation
101337	4	1	PATSY ANDERSON	I = Individual (s) not affiliated	QC complete	The proposed route of the transmission line between mileposts 35 to 42 is more reasonable than the older route proposed due to the following reasons: 4) The proposed routing would not be invasive to irrigation or farming practices.	25060 - Agriculture
101337	5	1	PATSY ANDERSON	I = Individual (s) not affiliated	QC complete	The proposed route of the transmission line between mileposts 35 to 42 is more reasonable than the older route proposed due to the following reasons: 5) The older proposed routing would cause constance interference with the reception or radio and television transmissions.	40000 - Electrical Environment
101337	6	1	PATSY ANDERSON	I = Individual (s) not affiliated	QC complete	The proposed route of the transmission line between mileposts 35 to 42 is more reasonable than the older route proposed due to the following reasons: 6) The previous proposed routing would have been placed over our home. With present proposed change this problem would be eliminated.	34010 - Private Land/Land Ownership
101337	7	1	PATSY ANDERSON	I = Individual (s) not affiliated	QC complete	The proposed route of the transmission line between mileposts 35 to 42 is more reasonable than the older route proposed due to the following reasons: 7) There would be less area to reclassify.	25050 - Community/city development and expansion, 34020 - County and City Plans/Zoning
101320	1	2	JAMES AND MARYANN SLEGERS	I = Individual (s) not affiliated	QC complete	We feel very strongly there is no need to further explore other routes tht the Regional Advisory Committee (RAC) has proposed. The RAC has spent	50010 - Segment 8 – Applicants' Proposed Route, 51010 - Segment 9 – Applicants' Proposed Route

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						hundreds of hours and thousands of dollars in reviewing various routes and concluded that the proposed location through the NCA is he BEST option. PLEASE DO NOT CHANGE THE ROUTE FROM THE NCA!	
101321	1	1	SCOTT NICHOLSON	I = Individual (s) not affiliated	QC complete	I strongly encourage you to go with route 8 & 9	50000 - Segment 8 General, 51000 - Segment 9 – General
101285	1	1	DUANE YAMAMOTO	I = Individual (s) not affiliated	QC complete	I am strongly in favor of the route proposed by the Regional Advisory Committee for Segment 8. The proposed route will have the least amount of impact on the cities of Kuna and Melba as well as nearby farmers. It will also be the most cost effective in terms of litigation, easements and "buy-outs". For power companies to be able to transfer power from other sources in emergencies and regulate usage at peak or slack times is an added plus.	16000 - Generally support project, 25060 - Agriculture, 34020 - County and City Plans/Zoning, 50010 - Segment 8 – Applicants' Proposed Route
101287	1	2	JAMES WELLS,THERESA WELLS	I = Individual (s) not affiliated	QC complete	We feel there is no need to look at any other routes as we approve the proposed Segment 8 route that the RAC has proposed! The previous route would have run the power lines directly above our home at the address stated above. With our current medical conditions and both being completely disabled it would make it impossible for us to remain in our home and very difficult for us to move! The RAC has spent hundreds of hours and thousands of dollars in reviewing various routes and concluded on the proposed location through the NCA. PLEASE DO NOT CHANGE THE ROUTE FROM THE NCA! Any further correspondence can be done through the above names and address.	50010 - Segment 8 – Applicants' Proposed Route
101288	1	1	MERRI MELDE	I = Individual (s) not affiliated	QC complete	I SUPPORT the RAC subcommittee's proposed route for Segment 9 that runs through the Morley Nelson Snake River Birds of Prey National Conservation Area. I SUPPORT enhancement for the NCA. I OPPOSE any route that goes through the Owyhee foothills and towns of Oreana, Grand View and Bruneau.	27040 - Native vegetation, 35010 - Enhancement requirements, 51010 - Segment 9 – Applicants' Proposed Route, 51020 - Segment 9 – Routes considered in the 2013 FEIS
101288	2	1	MERRI MELDE	I = Individual (s) not affiliated	QC complete	it has not yet been illustrated nor proven that this extra line is even necessary	11000 - Purpose and Need for the Project, 17000 - Generally oppose project
101288	3	1	MERRI MELDE	I = Individual (s) not affiliated	QC complete	the sagegrouse habitat will be disturbed with routes through the Owyhee foothills and the Oreana surroundings, while the RAC's recommended route through the Snake River Birds of Prey National Conservation Area will benefit raptors, and will destroy less land, since there is already a power line there,	28020 - Raptors/Eagles/Ravens, 28070 - Sage-grouse
101288	4	1	MERRI MELDE	I = Individual (s) not affiliated	QC complete	there are some possible Native American archaeological sites that have not been addressed along the Owyhee front in the Oreana area that could be affected by a power line that have not been addressed	24000 - Cultural Resources
101288	5	1	MERRI MELDE	I = Individual (s) not affiliated	QC complete	the scenic and remote Owyhee front is one of Idaho's treasures. Once you demolish a fragile desert landscape with construction and heavy equipment, it doesn't completely recover.	23000 - Visual Resources
101369	1	1	JOHN E FUQUAY	I = Individual (s) not affiliated	QC complete	Lines should go through birds of prey where existing lines are NOT through private land in Owyhee County.	34010 - Private Land/Land Ownership, 34011 - Site the line on public land, 50010 - Segment 8 – Applicants' Proposed Route, 51010 - Segment 9 – Applicants' Proposed Route
101333	1	1	BOYD & LOA ANDERSON LP,BOYD ANDERSON	I = Individual (s) not affiliated	QC complete	We strongly encourage you to take the recommendation for segment 8 as proposed by the Regional Advisory Committee and not go through private property!	34011 - Site the line on public land, 50010 - Segment 8 – Applicants' Proposed Route
101265	1	1	DON ROBERTS	I = Individual (s) not affiliated	QC complete	I support the Agency Preferred Alternate Route, FEIS Alternative Route - Alternative 8B-, the route marked as green/black. Any other options just serves to damage the fragile BOP even more than what the public and the Military is already doing out there. All those gravel trucks that run up and down Pleasant valley road on a daily basis is coating the area on either side of the desert in a thick layer of dust. What going to happen if the existing power line is modified? Even more damage.	27000 - Vegetation, 50020 - Segment 8 – Routes considered in the 2013 FEIS

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101229	1	1	DOUGLAS TEATER	I = Individual (s) not affiliated	QC complete	As a Southern Idaho native and property owner within the Segment 8 route study area, I strongly encourage the BLM to route Segment 8 through the Morley Nelson Birds of Prey – NCA as proposed by the Regional Advisory Council. It is my understanding that this route has been agreed to by Idaho Power, Rocky Mountain Power and the Bureau of Land Management. Further, the Regional Advisory Council has invested hundreds of hours and thousands of dollars reviewing the impacts of route options, and has also concluded that the best and proper route is through the NCA. I STRONGLY URGE THE BLM TO STAND FIRM ON ROUTING SEGMENT 8 THROUGH THE NCA.	50010 - Segment 8 – Applicants' Proposed Route
101315	2	1	DEANNA LEWIS	I = Individual (s) not affiliated	QC complete	PLEASE DO NOT CHANGE THE ROUTE FROM THE NCA!!!	50010 - Segment 8 – Applicants' Proposed Route, 51010 - Segment 9 – Applicants' Proposed Route
101267	1	1	MATTHEW E AND JEAN M BARNEY	I = Individual (s) not affiliated	QC complete	I wish to express my support for the proposed Segment 9 Alternative through the Snake River Birds of Prey National Conservation Area. I believe this is the segment marked 9D/F/G/H on the project map. Karen Steenhoff, my friend and a raptor specialist, has explained how this route would actually benefit raptors in the area, rather than harming them. Also there is plenty of evidence of human use in the SRNCA, including power lines that run through the area.	28020 - Raptors/Eagles/Ravens, 51010 - Segment 9 – Applicants' Proposed Route
101267	2	1	MATTHEW E AND JEAN M BARNEY	I = Individual (s) not affiliated	QC complete	I believe Segment 9E would decimate a large population of Greater Sage Grouse that breed near the proposed route. Based on the most recent project map, it appears that Segment 9E would pass through, or come very near to, an active lek in the vicinity of T4S, R2W, S35. To my knowledge, this is one of Idaho's largest leks. I have observed as many as 50 strutting Sage Grouse cocks at one time on this lek during my frequent April visits over the past 15 years. I believe construction of Segment 9E will destroy the lek, leading to the demise of the local population in a short time. With grouse already under extreme pressure to survive, I find this completely unacceptable.I believe Segment 9E would do significant damage to the human experience of being on the eastern Owyhee Front. To me it is a place of refuge and solace, a place to get away from the city, yet not too far to drive in a day. I can go out there and not see any sign of people for hours or even days if I pick the right spot. There are few signs of human development on the land and those are easy to overlook. Many of the roads aren't much more than wide trails. The only "improvements" are grazing allotment fences, far apart and often hidden by the land, and the occasional old wooden corral tucked into a canyon. When I am out there I feel in awe of the mighty forces that shaped the dramatic scenery--forces far beyond human control. I continue to be surprised by the tenacity and beauty of the unique plants and animals that flourish in that harsh landscape--a landscape that has (so far) defeated human efforts to tame it. The experiences I've had in that natural landscape have profoundly changed me as a person, for the better. A transmission line would be a very visible and unwelcome intrusion.	23000 - Visual Resources, 28070 - Sage-grouse, 51020 - Segment 9 – Routes considered in the 2013 FEIS
101346	1	1	PG MAC INC	I = Individual (s) not affiliated	QC complete	I approve the proposed segment 8 route that the Regional Advisory Committee (RAC) has proposed.	50010 - Segment 8 – Applicants' Proposed Route
101327	1	1	LAVAR THORNTON	I = Individual (s) not affiliated	QC complete	I strongly agree with their recommendation for the transmission line to go through the NCA.	50010 - Segment 8 – Applicants' Proposed Route, 51010 - Segment 9 – Applicants' Proposed Route
101327	2	1	LAVAR THORNTON	I = Individual (s) not affiliated	QC complete	I would be seriously impacted by the original route as it goes through some of my farmland .	34010 - Private Land/Land Ownership
101328	1	1	LEONARD LOPER	I = Individual (s) not affiliated	QC complete	The route from the NCA will be fine - please do not change it.	50010 - Segment 8 – Applicants' Proposed Route, 51010 - Segment 9 – Applicants' Proposed Route
101319	1	1	PERRY MCCORMACK	I = Individual (s) not affiliated	QC complete	There is NO need to look at any other routes and I approve the proposed segment 8 route that the regional Advisory Committee (RAC) has proposed. The RAC has spent hundreds of hours and thousands of dollars in reviewing	50010 - Segment 8 – Applicants' Proposed Route

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						various routes and concluded on the proposed location through the N.C.A. "PLEASE DO NOT CHANGE THE ROUTE FROM THE NCA."	
101329	1	1	SCHROEDER & LEZAMIZ LAW OFFICES, LLP,EDITH NETTLETON TESTAMENTARY TRUST	I = Individual (s) not affiliated	QC complete	I APPROVE the proposed Segment 8 route that the Regional Advisory Committee (RAC) has proposed.	50010 - Segment 8 – Applicants' Proposed Route
101311	1	2	SCOTT & ZOEANN GREENFIELD	I = Individual (s) not affiliated	QC complete	I agree and approve the proposed segment 8 route that the Regional Advisory Committee has proposed. This route has been reviewed and been determined to have the least amount of economic and environmental impact for everyone involved.	25000 - Socioeconomics, 50010 - Segment 8 – Applicants' Proposed Route
101312	1	1	DAVID BRADSHAW	I = Individual (s) not affiliated	QC complete	I approve the proposed route that the Regional Advisory Committee has proposed.	50010 - Segment 8 – Applicants' Proposed Route, 51010 - Segment 9 – Applicants' Proposed Route
101314	1	1	STACY LUNDERS	I = Individual (s) not affiliated	QC complete	I approve the segment 8 route that the Regional Advisory Committee has proposed.	50010 - Segment 8 – Applicants' Proposed Route
101315	1	1	DEANNA LEWIS	I = Individual (s) not affiliated	QC complete	Why would you consider going through private property where we live.	34010 - Private Land/Land Ownership
101316	1	1	REESE LEAVITT	I = Individual (s) not affiliated	QC complete	Please do not change the route from the NCA.	50010 - Segment 8 – Applicants' Proposed Route, 51010 - Segment 9 – Applicants' Proposed Route
101317	1	1	JERRY L AND MARY LOU TLUCEK	I = Individual (s) not affiliated	QC complete	As I understand this Gateway West Transmission Line project, it could be located 250 feet north of Summer Lake. The would totality wipe out three of our existing pivots, + ruin irrigation land. These pivots cost over $100,00 each.	25060 - Agriculture, 37000 - Agriculture (includes crop production, dairies, cattle feedlots, and grazing)
101317	2	1	JERRY L AND MARY LOU TLUCEK	I = Individual (s) not affiliated	QC complete	In addition, it would come very close to two of our existing homes.	34010 - Private Land/Land Ownership
101326	1	1	SHERRY AGNEW	I = Individual (s) not affiliated	QC complete	1) Too close to a city impact area in my mind is adverse to a continued growth pattern in the Kuna Area.	25050 - Community/city development and expansion, 34020 - County and City Plans/Zoning
101347	1	2	OWYHEE COUNTY, BOARD OF COMMISSIONERS,JOE MERRICK,VERLA MERRICK	I = Individual (s) not affiliated	QC complete	We are in favor of the revised application and routes proposed by the Power Companies and the RAC.	50010 - Segment 8 – Applicants' Proposed Route, 51010 - Segment 9 – Applicants' Proposed Route
101347	2	2	OWYHEE COUNTY, BOARD OF COMMISSIONERS,JOE MERRICK,VERLA MERRICK	I = Individual (s) not affiliated	QC complete	Placing the power lines through the BOPNCA will have less of a negative impact on private property and can have a great advantage on the already fragmented habitat in the NCA.	28010 - Habitat Fragmentation, 34010 - Private Land/Land Ownership, 35000 - NCA/SRBOP (general)
101347	3	2	OWYHEE COUNTY, BOARD OF COMMISSIONERS,JOE MERRICK,VERLA MERRICK	I = Individual (s) not affiliated	QC complete	The Enhancement Package proposed by the power companies is lacking in funding an the designation of funds needs to support the reestablishment of the landscape that supports the viability of the raptor population for which the NCA was established.	28020 - Raptors/Eagles/Ravens, 35030 - Applicants' MEP (specific to NCA), 35040 - Recommendations for MEP changes
101347	4	2	OWYHEE COUNTY, BOARD OF COMMISSIONERS,JOE MERRICK,VERLA MERRICK	I = Individual (s) not affiliated	QC complete	The enhancement package should be used to that end and not for removing power lines, purchasing property, law enforcement, or public education.	35040 - Recommendations for MEP changes
101347	5	2	OWYHEE COUNTY, BOARD OF COMMISSIONERS,JOE MERRICK,VERLA MERRICK	I = Individual (s) not affiliated	QC complete	The proposal for the power line lease is for 30 years and the Enhancement Package should be for that amount of time and beyond, not for only 10 years as proposed.	35040 - Recommendations for MEP changes
101313	1	1	PATRONS OF HUSBANDRY,	S = Special Interest Group	QC complete	There is no more grange or Patrons of Husbandry in Melba so you need not send any more info to us-	10010 - Out of scope comments
101350	1	2	FRISCH FARMS,KEN FRISCH,GARY FRISCH	I = Individual (s) not affiliated	QC complete	both proposed line routes go through farm ground which devalues the ground and negates any future installation of pivot irrigation systems.	25030 - Property Values, 25060 - Agriculture, 37000 - Agriculture (includes crop production, dairies, cattle feedlots, and grazing), 50010 - Segment 8 – Applicants' Proposed Route, 51010 - Segment 9 – Applicants' Proposed Route
101350	2	2	FRISCH FARMS,KEN FRISCH,GARY FRISCH	I = Individual (s) not affiliated	QC complete	Can you show us studies that without a doubt prove that peoples health is not affect by higher voltage line who live and work directly under them.	40000 - Electrical Environment, 41000 - Public Safety
101350	3	2	FRISCH FARMS,KEN FRISCH,GARY FRISCH	I = Individual (s) not affiliated	QC complete	To us the deferred route to the south is the most reasonable. If the concern is over the impact on wildlife, what is more important, wildlife or food and industrial producing humans. Wildlife have been adapting for hundreds of years, you read and hear on the news about various wildlife coming into the heavily populated areas of Boise every year. We have game birds running across our yards all summer long.	28000 - Wildlife (general), 51000 - Segment 9 – General

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101318	1	1	TOM KELLY	I = Individual (s) not affiliated	QC complete	There is no need to look at any other routes and I approve the proposed segment 8 route that the Regional Advisory Committee has proposed, The RAC has spent hundred of hours and thousands of dollars in reviewing various routes and concluded on the proposed location through the NCA. PLEASE DO NOT CHANGE THR ROUTE FROM THE NCA	50010 - Segment 8 – Applicants' Proposed Route
101345	1	1	GORDON L & NANCY A THOMPSON	I = Individual (s) not affiliated	QC complete	Segment 8 Application proposed is the best route to take. All impact has already be made with the first line on old line. The new line could be stack on the old line for less impact. Beside would be ok. Segment9 take in a completely new impact.	50010 - Segment 8 – Applicants' Proposed Route, 51000 - Segment 9 – General
101341	1	1	MERLE AND LINDA CARLSGAARD	I = Individual (s) not affiliated	QC complete	The proposed Segment 8 is the best option and there is no need to look further. Even the Regional Advisory Committee has proposed this route. It is shorter and has less impact on private properties. With the proper installation Birds of Prey will have minimal impact on there well being. The shorter route will use less materials hense the consumer will not have as big of a impact in there power bills.	25000 - Socioeconomics, 28020 - Raptors/Eagles/Ravens, 34010 - Private Land/Land Ownership, 50010 - Segment 8 – Applicants' Proposed Route
101343	1	1	ROBERT NETTLETON	I = Individual (s) not affiliated	QC complete	There is not need to look at any other routes and I APPROVE the proposed Segment 8 route that the Regional Advisory Committee (RAC) has proposed. The RAC has spend hundreds of hours and thousands of dollars in reviewing various routes and concluded on the proposed location through the NCA. PLEASE DO NOT CHANGE THE ROUTE FROM THE NCA.	50010 - Segment 8 – Applicants' Proposed Route
101344	1	1	GREGORY SANCHEZ	I = Individual (s) not affiliated	QC complete	approve the proposed Segment 8 Route that the RAC proposed. this has been a long process with many hours invested - please accept this proposed route without making further changes.	50010 - Segment 8 – Applicants' Proposed Route
101326	2	1	SHERRY AGNEW	I = Individual (s) not affiliated	QC complete	2) Also I have attended many of these meetings and feel Idaho Powers contribution to the stabilization of any ill effects to raptors and /or their habitat makes it conceivable to Route South of the Morley Nelsen's Snake River Birds of Prey NCA areas, possible without harm.	28020 - Raptors/Eagles/Ravens, 51020 - Segment 9 – Routes considered in the 2013 FEIS, 51030 - Segment 9 – RAC Route Options
101317	3	1	JERRY L AND MARY LOU TLUCEK	I = Individual (s) not affiliated	QC complete	Summer lake Transmission already crosses over one mile of our property. Why wouldn't it be possible to install this new line over the tip of Summer Lake? We will do whatever we can to oppose this 250 feet North Route.	50010 - Segment 8 – Applicants' Proposed Route, 48000 - Design Features
101342	1	1	LEONARD & MARY LOPER	I = Individual (s) not affiliated	QC complete	Please do not change the route from the NCA.	50010 - Segment 8 – Applicants' Proposed Route, 51010 - Segment 9 – Applicants' Proposed Route
101257	1	1	HAROLD RAY TABOR	I = Individual (s) not affiliated	QC complete	There is no need to look at any other routes and I approve the proposed segment 8 route RAC has proposed. Please do not change the route from the NCA.	50010 - Segment 8 – Applicants' Proposed Route
101249	1	1	BURL J SMITH	I = Individual (s) not affiliated	QC complete	There is no need to look @ any other routes - + I approve the proposed segment 8 route that the reginal advisory committee has proposed - Do not spend any more time or money on the project! Please do not change the route from the NCA!	50010 - Segment 8 – Applicants' Proposed Route
101272	1	1	RICHARD FRIDDLE	I = Individual (s) not affiliated	QC complete	There is no need to look at any other routes and I approve the segment 8 route that the Regional Advisory Committee has proposed Please do not change the route from the NCA	50010 - Segment 8 – Applicants' Proposed Route
101281	1	1	DONALD HAMILTON	I = Individual (s) not affiliated	QC complete	I strongly oppose routing segments 8 (eight) across private ground when public land, the Birds of Prey Area, is available. The M Nelson birds of Prey already has high tension PowerLines running across it. This "Gateway Project" is supposedly for "The Public Good." Let it be built on the "Public's" lands. There is no need to look at any other routes and I approve the proposed segment 8 route that the Regional Advisory Committee has proposed. The RAC spent thousands of hours + thousands of dollars on this various routes and concluded on the ROUTE through the NCA. PLEASE DO NOT CHANGE THE ROUTE FROM THE NCA.	34010 - Private Land/Land Ownership, 34011 - Site the line on public land, 50010 - Segment 8 – Applicants' Proposed Route

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101282	1	1	WILLIAM A BERRY	I = Individual (s) not affiliated	QC complete	Theres no need to look at other routes. I approve of the proposed segment 8 route that the RAC has proposed. Please do not change the route from the NCA.	50010 - Segment 8 – Applicants' Proposed Route
101283	1	1	JOYCE BURCH	I = Individual (s) not affiliated	QC complete	The RAC proposed routes for Segments 8 and 9 are the correct choice and there is no reason to look at any other routes. Enough time and money has already been spent reviewing various routes and the decision the committee reached, going through the NCA is best for all concerned. Please do not change the route from the NCA, as proposed by the RAC.	50010 - Segment 8 – Applicants' Proposed Route, 51010 - Segment 9 – Applicants' Proposed Route
101284	1	0	DON ROBERTS	I = Individual (s) not affiliated	QC complete	My question is about segment number eight and it looks like that's going actually through our property and it's hard to understand the maps. I'm hoping to talk to a human to try to figure out what the heck I'm looking at here. Uhh, please give me a call 287-9846.	34010 - Private Land/Land Ownership, 50000 - Segment 8 General
101280	1	1	BETTY HAMILTON	I = Individual (s) not affiliated	QC complete	There is no need to look at any other routes and I approve the proposed segment 8 route that the Regional Advisory Committee (RAC) has proposed. The RAC has spent hundreds of hours + thousands of dollars and reviewing various routes and concluded on the proposed location through the NCA. Please DO NOT CHANGE THE ROUTE FROM THE NCA.	50010 - Segment 8 – Applicants' Proposed Route
101279	1	1	WENDY CORNWELL	I = Individual (s) not affiliated	QC complete	There is no need to look at any other routes and I approve the proposed Segment 8 route that the RAC has proposed. The RAC has spent hundreds of hours & thousands of dollars in reviewing various routes & concluded on the proposed locations through the NCA. Please don't change the route from the NCA.	50010 - Segment 8 – Applicants' Proposed Route
101274	1	1	EVELYN RAE GRIMES	I = Individual (s) not affiliated	QC complete	I strongly encourage you to look at only the proposed Segment 8 route that the Regional Advisory Committee (RAC) has proposed. I approve this proposed 8 segment. The RAC has spent hundreds of hours and thousands of dollars in reviewing various routes and concluded on the proposed location through the NCA.	50010 - Segment 8 – Applicants' Proposed Route
101275	1	1	RICHARD BRANDAU	I = Individual (s) not affiliated	QC complete	I am in favor of the August 8, 2014 revised application for segments 8 and 9 of the Gateway West Transmission Line Project, which incorporate routing options evaluated by the Regional Advisory Council. I support the position ofthe Owyhee County Board of Commissioners, the RAC, the Owyhee County Natural Resource Committee, and the Owyhee County Citizens Task Force. There is no need to look at any other routes and I approve Segment 8 & 9 as submitted in the August 8, 2014 revised application. Keeping the transmission lines in the August 8, 2014 proposed Segments 8 & 9 corridor makes the best sense. I am 67 years old and have lived here my whole live. I saw the construction of the existing 500KV Pacific Power and Light line during the 1970' s. I've seen its' impacts, both positive and negative and the positives outweigh the negatives. There will be fewer negative impacts if Segments 8 & 9 is approved.	16000 - Generally support project, 50010 - Segment 8 – Applicants' Proposed Route, 51010 - Segment 9 – Applicants' Proposed Route
101276	1	1	CONNIE BRANDAU	I = Individual (s) not affiliated	QC complete	I am in favor of the August 8, 2014 revised application for segments 8 and 9 of the Gateway West Transmission Line Project (which incorporate routing options evaluated by the Regional Advisory Council) and the proposed MEP submitted by "the proponents".	35030 - Applicants' MEP (specific to NCA), 50010 - Segment 8 – Applicants' Proposed Route, 51010 - Segment 9 – Applicants' Proposed Route
101276	2	1	CONNIE BRANDAU	I = Individual (s) not affiliated	QC complete	Please do not diminish the value of the time, work, and efforts put forth by "the proponents" of the MEP. The "proponents" of include citizens of Owyhee County who have many vested interests, the most precious of which are their private property rights. Keeping the transmission lines on the BOPNCA would mean less negative impact to private property fewer linear miles of line to construct	34010 - Private Land/Land Ownership

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101276	3	1	CONNIE BRANDAU	I = Individual (s) not affiliated	QC complete	Keeping the transmission lines in the BOPNCA to avoid sage grouse habitat and placing a predator species in closer proximity to a potentially endangered species.	28070 - Sage-grouse, 35000 - NCA/SRBOP (general)
101276	4	1	CONNIE BRANDAU	I = Individual (s) not affiliated	QC complete	Keeping the transmission lines it in the BOPNCA avoid having to an1end numerous BLM land use plans.	34030 - Federal land Use Plans
101276	5	1	CONNIE BRANDAU	I = Individual (s) not affiliated	QC complete	Keeping the transmission lines in the BOPNCA because data supports the benefit of existing lines already sited in the NCA as beneficial to raptors.	28020 - Raptors/Eagles/Ravens
101276	6	1	CONNIE BRANDAU	I = Individual (s) not affiliated	QC complete	Keeping the transmission lines on the BOPNCA would mean fewer linear miles of transmission line to construct.	25000 - Socioeconomics
101276	7	1	CONNIE BRANDAU	I = Individual (s) not affiliated	QC complete	Keeping the transmission lines on the BOPNCA would mean that roads to access the construction area are already in place (Baja-east side of Snake River from Swan Falls to Grand View) as opposed to all new road through sage grouse habitat on the West side of the Snake River.	38000 - Transportation
101276	8	1	CONNIE BRANDAU	I = Individual (s) not affiliated	QC complete	Keeping the transmission lines on the BOPNCA would mean less negative impact to the historic areas of Owyhee County: Guffy, Murphy, Silver City, Sinker Creek, Oreana, Castle Creek, Grand View, Bruneau, the Bruneau River, Bruneau Sand Dunes, Hot Springs, and this entire segment of the Oregon Trail.	24000 - Cultural Resources, 24010 - Historic Trails
101276	9	1	CONNIE BRANDAU	I = Individual (s) not affiliated	QC complete	Keeping the transmission lines on the BOPNCA would mean that there would be fewer and less intense water quality issues related to construction. As a 10 year plus member of the Mid-Snake Succor Creek Water Shed Advisory Group, I am aware that there are numerous perennial and ephemeral creeks, canyons, and drainages that enter the Snake River from the Owyhee Breaks on the west that would have to be crossed and few (if any) that enter from the BOPNCA and the Kuna desert on the east.	27030 - Wetlands/Riparian vegetation, 33000 - Water Resources and Use
101276	10	1	CONNIE BRANDAU	I = Individual (s) not affiliated	QC complete	Keeping the transmission lines on the BOPNCA would avoid winter feeding habitat areas for mule deer, antelope, mountain sheep, and wild horse herds as identified by various Idaho agencies. There are more species of concern (SC) and sensitive species (SS) in the Deferred Decision areas in Owyhee County than there are in the proposed routes Segment 8 & 9.	28000 - Wildlife (general), 28030 - Big Game/Winter Range, 28060 - Other Special Status Wildlife
101276	11	1	CONNIE BRANDAU	I = Individual (s) not affiliated	QC complete	A positive economic impact to our budding Idaho industries is dependent on the availability to access electrical power. Good, sound, long term planning is necessary to make that access possible. It stands to reason that the closer the power is to developed areas the more the public will benefit and the less the cost to them will be. There is great potential for green energy production (wind, solar, and hydro) along the Snake River Canyon in Idaho. The August, 2014 revised application for Segments 8 & 9 would keep the transmission lines in an area that would allow more convenient and lest costly access to that type of power production. Keeping the transmission lines in the August 8, 2014 proposed Segments 8 & 9 corridor makes the best sense.	16000 - Generally support project, 25050 - Community/city development and expansion
101278	1	1	JAMES SCHOFIELD	I = Individual (s) not affiliated	QC complete	My property backs up the BLM Land and my concern is my view of the Owyhee desert will be impacted. The view of the canyons and buttes was a huge reason for selecting my property, (of course nobody informed me of the possibility of such a transmission line). My hope is to not have it to the west of my property. However, should it get built, please locate it as far west as Kane Spring Road to reduce the visual impact.	23000 - Visual Resources
101223	1	2	ANTHONY MILLER,TERRY MILLER	I = Individual (s) not affiliated	QC complete	Enough time and resources have been expended on this project. The proposed segment 8 route is the sensible course of action. For the good of the local economy and the people you serve approve it and move on.	25000 - Socioeconomics, 50010 - Segment 8 – Applicants' Proposed Route
101250	1	1	GARLAND HOUSLEY	I = Individual (s) not affiliated	QC complete	Leave the transmission Line project as proposed through the morley nelson Bird of prey	50010 - Segment 8 – Applicants' Proposed Route, 51010 - Segment 9 – Applicants' Proposed Route

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101230	1	2	SHARON STRICKLAND,RICHARD STRICKLAND JR	I = Individual (s) not affiliated	QC complete	Why are BOTH Segment 8 and Segment 9 necessary? It appears that this is simply placing two lines across the same distance, where one line is proposed in other areas. We recommend Segment 9 and Alternative 9E that take the line across mostly public land, where the least amount of private residences would be affected.	34010 - Private Land/Land Ownership, 34011 - Site the line on public land, 51020 - Segment 9 – Routes considered in the 2013 FEIS
101230	2	2	SHARON STRICKLAND,RICHARD STRICKLAND JR	I = Individual (s) not affiliated	QC complete	If Segment 8 MUST be included, then we urge the BLM to consider Alternative 8A, where less private land would be impacted; there is an existing corridor already in existence on 8A that runs south of the Shoestring Road, and there would less disturbance to golden eagles and owls in the 8A alternative.	28000 - Wildlife (general), 28020 - Raptors/Eagles/Ravens, 50020 - Segment 8 – Routes considered in the 2013 FEIS
101230	3	2	SHARON STRICKLAND,RICHARD STRICKLAND JR	I = Individual (s) not affiliated	QC complete	Regarding your responses to our comments made on the Final EIS: As we previously stated, there is an old transmission line that runs approximately 1/4 mile south of our home. Placing another line there with 160-180ft towers will lower our property values. You stated that because the line will run south of the present line and we are on the north, there would be less visual impact. Just what is the definition of "less" - ? The visual impact difference would be minimal at best. And to the person who made the snarky comment that none of the 1500 observation points were on our porch, we invite you to come and see for yourself just what a visual impact (and consequential loss in property value) we will suffer if Segment 8 is approved as proposed.	23000 - Visual Resources, 25030 - Property Values, 50000 - Segment 8 General
101221	1	1	JOHN FRIEDENREICH	I = Individual (s) not affiliated	QC complete	I approve the proposed Segment 8 route that the Regional Advisory Committee (RAC) has proposed. The RAC does not need to spend additional time or money to review any other route options. Please do not change the route from the NCA for Segment 8.	50010 - Segment 8 – Applicants' Proposed Route
101256	1	1	RONALD WRIGHT	I = Individual (s) not affiliated	QC complete	There is no need to look at any other routes and I approve the proposed segment 8 route that the regional advisory committee has proposed. The RAC has spent hundreds of hours and thousands of dollars in reviewing various routes and concluded on the proposed location through the NCA. Please do not change the route from the NCA.	50010 - Segment 8 – Applicants' Proposed Route
101258	1	1	KLAR LLC,KELLY MANN	I = Individual (s) not affiliated	QC complete	Please do not change the route from the NCA. I agree with the preferred routes from segments 8 and 9 as proposed.	50010 - Segment 8 – Applicants' Proposed Route, 51010 - Segment 9 – Applicants' Proposed Route
101247	1	1	RICHARD KERSHNER	I = Individual (s) not affiliated	QC complete	The line North of Orchard, Owyhee, Melba and South of Kuna is not wownted at all.	50020 - Segment 8 – Routes considered in the 2013 FEIS
101247	2	1	RICHARD KERSHNER	I = Individual (s) not affiliated	QC complete	The line North of Orchard and South of Owyhee, Melba Kuna is ok.	50010 - Segment 8 – Applicants' Proposed Route, 50020 - Segment 8 – Routes considered in the 2013 FEIS
101247	3	1	RICHARD KERSHNER	I = Individual (s) not affiliated	QC complete	The other 2 Lines south of these 2 are ok.	51010 - Segment 9 – Applicants' Proposed Route, 51020 - Segment 9 – Routes considered in the 2013 FEIS
101251	1	1	ANNA ROGERS	I = Individual (s) not affiliated	QC complete	Please do not change the route from The NCA. The RAC has spent many hours and thousands of dollars reviewing various routes & concluded on the proposed location through the NCA. There is no need to look at any other routes. I approve the proposed segment 8 route that the RAC has proposed.	50010 - Segment 8 – Applicants' Proposed Route
101260	1	2	JERRY SWORD,RAMONA SWORD	I = Individual (s) not affiliated	QC complete	My wife and I approve the proposed segment 8 route that the RAC has proposed. We feel there is no need to look at any other routes. The RAC has spent hundreds of hours and thousands of dollars in reviewing various routes and have concluded on the proposed location through the NCA. Please do no change the route from the NCA.	50010 - Segment 8 – Applicants' Proposed Route
101222	1	1	WILDEARTH GUARDIANS,ERIK MOLVAR	S = Special Interest Group	QC complete	Proposed route alterations currently under consideration involve additional alternatives in southwestern Idaho, but as the BLM is reopening the NEPA process, the agency should also consider route alternatives in western Wyoming to avoid the sage grouse Core Area north of Kemmerer, and instead carry the line westward along Interstate 80 until reaching the Utah border.	10000 - Conformance with the NEPA process, 18000 - Comments on segments 1 to 7 & 10, 28070 - Sage-grouse
101222	2	1	WILDEARTH GUARDIANS,ERIK MOLVAR	S = Special Interest Group	QC complete	In addition, BLM notes that WECC has relaxed its offset requirements for other power lines to 250 feet; this applies across the entire length of the proposed new line, and it is a reasonable alternative to revisit each and all of	10000 - Conformance with the NEPA process, 13000 - Use of/ Failure to use designated corridors, 18000 - Comments on segments 1 to 7 & 10, 50010 - Segment 8

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						the segments to ensure that new powerlines are sited as close as possible to existing transmission lines.	– Applicants' Proposed Route, 51010 - Segment 9 – Applicants' Proposed Route
101222	3	1	WILDEARTH GUARDIANS,ERIK MOLVAR	S = Special Interest Group	QC complete	According to BLM policy, the agency must consider in detail under at least one alternative the science-based recommendations of the agency's National Technical Team ("NTT," 2011) in these plan revisions. The NTT recommended that sage grouse Priority Habitats be treated as exclusion zones for overhead transmission lines, and this recommendation should be implemented throughout the length of the Gateway West transmission corridor.	10000 - Conformance with the NEPA process, 18000 - Comments on segments 1 to 7 & 10, 28070 - Sage-grouse, 50010 - Segment 8 – Applicants' Proposed Route, 51020 - Segment 9 – Routes considered in the 2013 FEIS
101222	4	1	WILDEARTH GUARDIANS,ERIK MOLVAR	S = Special Interest Group	QC complete	Braun et al. (2002) reported that 40 leks with a power line within 0.25 mile of the lek site had significantly slower population growth rates than unaffected leks, which was attributed to increased raptor predation. Dinkins (2013) documented sage grouse avoidance of powerlines not just during the nesting period but also during early and late brood-rearing. Wisdom et al. (2011) also documented strong relationships between grouse lek extirpation and proximity to transmission lines. In other sage grouse plan amendment DEISs, BLM has documented negative effects to 4 miles from powerlines and beyond.	28070 - Sage-grouse
101222	5	1	WILDEARTH GUARDIANS,ERIK MOLVAR	S = Special Interest Group	QC complete	Simply requiring perch inhibitors to be installed on powerlines is not an adequate regulatory mechanism (see Prather 2010, Lammers and Collopy 2007); such perch deterrents reduce, but do not eliminate, raptor perching (Slater and Smith 2010). Notably, it was golden eagles and ravens, two of the most important sage grouse predators and nest predators, respectively, that most effectively circumvented powerline perch inhibitors in this study.	28020 - Raptors/Eagles/Ravens, 28070 - Sage-grouse, 48000 - Design Features
101222	6	1	WILDEARTH GUARDIANS,ERIK MOLVAR	S = Special Interest Group	QC complete	We are concerned that large-scale transmission lines such as this one are detrimental to greater sage grouse through providing roosting and nesting opportunities for corvids and birds of prey that are sage grouse predators and/or nest predators, by triggering behavioral avoidance of otherwise suitable habitats, and by presenting direct mortality hazards through collisions. For these reasons, transmission lines should not be allowed in or even near identified Priority Habitats or Priority Areas for Conservation (PACs). A two-mile buffer from these sensitive sage grouse habitats should effectively minimize the impacts of this project on greater sage grouse.	28020 - Raptors/Eagles/Ravens, 28070 - Sage-grouse
101222	7	1	WILDEARTH GUARDIANS,ERIK MOLVAR	S = Special Interest Group	QC complete	We are also concerned that the cumulative impact of numerous powerlines and highways taken together may come to form a barrier to sage grouse migration and dispersal. Please determine through your NEPA analysis whether current or cumulative densities of infrastructure are already or will with the future addition of this transmission line present a barrier to sage grouse movement.	10000 - Conformance with the NEPA process, 28070 - Sage-grouse, 43000 - Cumulative Effects
101222	8	1	WILDEARTH GUARDIANS,ERIK MOLVAR	S = Special Interest Group	QC complete	Sage grouse have little tolerance for interstate highways (Knick et al. 2013). Along Interstate 80 in Wyoming and Utah between 1970 and 2003, observers found no leks within 2 km (1.25 mi) of the interstate and fewer birds on leks within 7.5 km (4.7 mi) than within 7.5–15 km (4.7–9.3 mi) beyond the interstate (Connelly et al. 2004). According to BLM's own NEPA analysis: Impacts on GRSG accrue over varying distances from origin depending on the type of development: - Interstate highways at 4.7 miles (7.5 kilometers) and paved roads and primary and secondary routes at 1.9 miles (3 kilometers) based on indirect effects measured through road density studies (Connelly et al. 2004; Holloran 2005; Lyon 2000) Nevada – Northeastern California Greater Sage-grouse RMP Amendment DEIS at 605. BLM should give serious consideration to locating all transmission line segments within 4.7 miles of interstate highways for this reason.	28070 - Sage-grouse, 38000 - Transportation
101222	9	1	WILDEARTH GUARDIANS,ERIK MOLVAR	S = Special Interest Group	QC complete	It is critically important that BLM consider in detail the best available science regarding minimizing the impacts of siting this transmission line on sage grouse. Please procure and analyze in detail each of the scientific studies	10000 - Conformance with the NEPA process, 45000 - Literature Used/Not Used

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						referenced in the Literature Cited section of these comments and incorporate them into the analysis of direct and cumulative impacts in the Supplemental Draft EIS.	
101255	1	1	DANA HENNIS	I = Individual (s) not affiliated	QC complete	I approve the proposed segment 8 route that the regional advisory committee has proposed. The RAC has spent hundreds of hours and thousands of dollars in reviewing various routes and concluded on the proposed location through the NCA. PLEASE DO NOT CHANGE THE ROUTE FROM THE NCA.	50010 - Segment 8 – Applicants' Proposed Route
101224	1	1	DAVID L PALFREYMAN	B = Business or Business Group	QC complete	After attending several public hearings and providing input, I strongly support the proposed Segment 8 route that the Regional Advisory Committee has proposed. Much time and expense has been expended in reviewing multiple alternative routes. I feel strongly that the proposed location through the NCA is right for all parties. Please do not change the NCA route.	50010 - Segment 8 – Applicants' Proposed Route
101239	1	3	OWYHEE COUNTY,KELLY ABERASTURI,JERRY HOAGLAND,JOE MERRICK	G = Government	QC complete	This document provides the Owyhee County Idaho Scoping Comment on the Gateway West Segments 8 and 9. GENERAL COMMENTS: We are pleased that the cunent proposed routings of the two segments are the routings developed and supported by the RAC Subcommittee. We believe the best altematives for the two segments are those routes.	50010 - Segment 8 – Applicants' Proposed Route, 51010 - Segment 9 – Applicants' Proposed Route
101239	2	3	OWYHEE COUNTY,KELLY ABERASTURI,JERRY HOAGLAND,JOE MERRICK	G = Government	QC complete	We are disappointed in the failure of the power companies to adopt the Mitigation and Enhancement Portfolio developed by the RAC Subcommittee. The RAC Subcommittee looked carefully at the proposed Mitigation and Enhancement from the perspective of what was required to make the routes through the NCA workable in terms of both the legislative/regulatory requirement of the NCA and the possible opposition from various interest groups. That the companies failed to fully adopt the Subcommittee's work, we believe, places the project in jeopardy. We will contact Idaho Power directly to voice our concerns on this important matter.	12000 - Relationships to other federal laws and policies, 35020 - Mitigation suggestions, 35030 - Applicants' MEP (specific to NCA), 35040 - Recommendations for MEP changes
101239	3	3	OWYHEE COUNTY,KELLY ABERASTURI,JERRY HOAGLAND,JOE MERRICK	G = Government	QC complete	1. The Record of Decision issued by the BLM in November 2013 called upon BLM to evaluate and refine the Mitigation and Enhancement plan to ensure that it is sufficient to meet the enhancement requirements of the legislation that designated the BOPNCA. To authorize a right-of-way (ROW) under the Federal Land Policy and Management Act (FLPMA) through any portion of the BOPNCA, the BLM is charged with demonstrating that an enhancement program will result in a net benefit to the NCA for the duration of the permit (PL 1 03-64). The Companies have not demonstrated that their plan will create a net benefit to the BOPNCA relative to current conditions, and the August version of the plan appears insufficient to meet the enhancement requirements of the enabling legislation.	12000 - Relationships to other federal laws and policies, 35000 - NCA/SRBOP (general), 35010 - Enhancement requirements, 35030 - Applicants' MEP (specific to NCA)
101239	4	3	OWYHEE COUNTY,KELLY ABERASTURI,JERRY HOAGLAND,JOE MERRICK	G = Government	QC complete	2. There are various statements in the proposal which are misleading or erroneous in regard to impacts on either the " ... values for which the NCA was designated ... " (Pages 6 and 18, for example) or on the impacts to rap tors (page 18 for example). The RAC Subcommittee analysis did not indicate "no impacts" but rather indicated where the lines could be located with minimized impacts through mitigation and enhancement. Statements indicating "no impacts" are not only incorrect, they also offer easy wins for opposition groups if the proposed route is litigated.	28020 - Raptors/Eagles/Ravens, 35030 - Applicants' MEP (specific to NCA)
101239	5	3	OWYHEE COUNTY,KELLY ABERASTURI,JERRY HOAGLAND,JOE MERRICK	G = Government	QC complete	3. The Companies' mitigation and enhancement portfolio, has been reviewed by the RAC Subcommittee which prompted numerous suggested improvements. The version reviewed by the Subcommittee was not the final version submitted by the Companies, however, the RAC Subcommittee	35030 - Applicants' MEP (specific to NCA), 35040 - Recommendations for MEP changes

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						proposals were not adopted by the Companies and the version submitted does not address or mitigate the issues raised by the RAC Subcommittee.	
101239	6	3	OWYHEE COUNTY,KELLY ABERASTURI,JERRY HOAGLAND,JOE MERRICK	G = Government	QC complete	. The Companies used a formula for calculation of mitigation which is apparently a common practice in the industry. However, "Enhancement" is unique to the Birds of Prey NCA and is not the same as "mitigation." Calculating "enhancement" for the Birds Of Prey NCA is likely the first instance of such a calculation in the planning or a transmission line route. The current enhancement package is weak and, if uncorrected, will be the fail point of the proposed routes.	35010 - Enhancement requirements, 35030 - Applicants' MEP (specific to NCA), 35040 - Recommendations for MEP changes
101239	7	3	OWYHEE COUNTY,KELLY ABERASTURI,JERRY HOAGLAND,JOE MERRICK	G = Government	QC complete	5. Included in the Portfolio is the purchase of property to protect cultural resources. This purchase is unnecessary and contrary to the stated goals of Owyhee County, and other rural counties, to maintain the current acreage of land in private ownership vs seeing private lands (which support the county tax base) to be transferred to federal ownership.	24000 - Cultural Resources, 34010 - Private Land/Land Ownership, 34020 - County and City Plans/Zoning, 35030 - Applicants' MEP (specific to NCA), 35040 - Recommendations for MEP changes, 25040 - Taxes/Taxpayers, 57000 - General project effects on Counties
101239	8	3	OWYHEE COUNTY,KELLY ABERASTURI,JERRY HOAGLAND,JOE MERRICK	G = Government	QC complete	6. The proposed habitat improvements are limited in acreage and will be of limited benefit. They are inadequate in both the dollar amounts and the proposed projects. Enhancements should be planned at the landscape level to be effective.	27000 - Vegetation, 35030 - Applicants' MEP (specific to NCA), 35040 - Recommendations for MEP changes
101239	9	3	OWYHEE COUNTY,KELLY ABERASTURI,JERRY HOAGLAND,JOE MERRICK	G = Government	QC complete	7. Current portfolio contains public education. BLM is already fully engaged in such public education as are groups such as the Peregrine Foundation. This duplication of effort will bring little improvement and is a waste of funds better spent elsewhere	35030 - Applicants' MEP (specific to NCA), 35040 - Recommendations for MEP changes
101239	10	3	OWYHEE COUNTY,KELLY ABERASTURI,JERRY HOAGLAND,JOE MERRICK	G = Government	QC complete	8. The Companies' enhancement package proposes a myriad of various projects without demonstrating how standards of enhancement will be met during the life of the project. 9. Funds currently proposed in the portfolio for education and land purchase should be used for more effective enhancement projects as noted in the Subcommittee report. 10. A simple, low cost study should be completed to determine the cost savings of the proposed segments 8 and 9 routes to clearly show the economic benefits to the companies that occur from routes through the NCA where roads and other infrastructure are already present. The study should include the cost savings obtained where roads exist, thus eliminating easement access, applications costs, and construction. 11 . Once the potential savings are known, a more reasonable and viable Mitigation and Enhancement Portfolio can be developed. The enhancement package should not be punitive but must meet the standards of the legislation for the BOP NCA.	25000 - Socioeconomics, 35030 - Applicants' MEP (specific to NCA), 35040 - Recommendations for MEP changes, 38000 - Transportation
101240	1	2	OWYHEE CITIZENS TASK FORCE,ERNIE BREUER,ROBYN C THOMPSON	I = Individual (s) not affiliated	QC complete	We officially would like to express our graditude to the BLM for deferring their decision reguarding segments 8 & 9 of the Gateway West Transmission Line Project. We diligently attended the 11 RAC subcommittee meetings, the one work session and both field trips. Our comments, power point presentation and map were respectively received by the RAC subcommittee. We enthusiastically endorse the Proponents Revised Application Proposed Routes for segments 8 & 9. We have thoroughly read and endorse the Boise District Resource Advisory Council Subcommittee Report on Gateway West Segments 8 and 9 Route Options in or near the Morley Nelson Snake River Birds of Prey National Conservation Area dated May 30, 2014	16000 - Generally support project, 50010 - Segment 8 – Applicants' Proposed Route, 51010 - Segment 9 – Applicants' Proposed Route
101240	2	2	OWYHEE CITIZENS TASK FORCE,ERNIE BREUER,ROBYN C THOMPSON	I = Individual (s) not affiliated	QC complete	We would like to add information discussed with the subcommittee on the March 27th field trip: Segment 8: Summer Lake Option 1 is to cross HWY 78 250' North of the existing 500 kV line. The Summer Lake Option, once it reaches the existing tower will @ that point become the most eastward kV line. The existing 500kV	50010 - Segment 8 – Applicants' Proposed Route, 48000 - Design Features

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						line will move N. W. of summer lake option to minimize the impact to existing homes and the Blue Canoe 2 Gufty.	
101240	3	2	OWYHEE CITIZENS TASK FORCE,ERNIE BREUER,ROBYN C THOMPSON	I = Individual (s) not affiliated	QC complete	Segment 9: Baja Road - Murphy Flat South will approach Hemingway N. W. of the Summer Lake Option.	51010 - Segment 9 – Applicants' Proposed Route, 48000 - Design Features
101240	4	2	OWYHEE CITIZENS TASK FORCE,ERNIE BREUER,ROBYN C THOMPSON	I = Individual (s) not affiliated	QC complete	All lines should enter and exit on the west end of the Hemingway substation to prevent sandwiching the residents residing in the China Ditch community. John Chatburn, Idaho Department of Energy and Keith Georgeson Project Leader Idaho Power are aware of these proposals. We are including a diagram for clarification.	48000 - Design Features
101241	1	1	JOHNSON FARMS,RICK JOHNSON	I = Individual (s) not affiliated	QC complete	I approve of the proposed Segment 8 route that the RAC has proposed.	50010 - Segment 8 – Applicants' Proposed Route
101273	1	2	LOUIS & DEANNA SANCHEZ	I = Individual (s) not affiliated	QC complete	We strongly approve the proposed Segment 8 Route that the Regional Advisory Committee (RAC) has proposed. The RAC has spent hundreds of hours and thousands of dollars in reviewing various routes for the Gateway West Transmission Line Project and have concluded on the proposed location through the NCA. Please do not change the route from the NCA, (Morley Nelson Birds of Prey).	50010 - Segment 8 – Applicants' Proposed Route
101290	1	2	CAROL BRAND,RICK BRAND	I = Individual (s) not affiliated	QC complete	We are pleased that the Companies have adopted the Resource Advisory Council (RAC) subcommittee's recommended routes as their proposed action.	50010 - Segment 8 – Applicants' Proposed Route, 51010 - Segment 9 – Applicants' Proposed Route
101290	2	2	CAROL BRAND,RICK BRAND	I = Individual (s) not affiliated	QC complete	By avoiding private land and sage-grouse habitat, these routes minimize conflicts with people and resources.	28070 - Sage-grouse, 34010 - Private Land/Land Ownership
101290	3	2	CAROL BRAND,RICK BRAND	I = Individual (s) not affiliated	QC complete	However, it is disappointing that the Companies did not adopt the RAC subcommittee's May 30, 2014 recommendations about the Mitigation and Enhancement Portfolio in their August revision of that document. The proposed routes will not be acceptable to BLM and Conservation Lands advocates if they are not accompanied by a substantive and meaningful plan to mitigate and enhance resources and values within the Morley Nelson Snake River Birds of Prey Area. The Companies have not demonstrated that their plan will create a net benefit to the BOPNCA relative to current conditions, and the August version of the plan appears insufficient to meet the enhancement requirements of the enabling legislation. We urge the BLM and the Companies to re-consider the RAC subcommittee comments on the Enhancement package. The May 30 report identifies deficiencies in the plan that still have not been addressed, and it recommends actions that have not been included in the revised plan. The Companies and BLM have invested a great deal of time and money in this project, and it appears they have finally gotten public support for feasible, proposed routes. However, the proposed routes will be dead on arrival if the Companies don't invest more in constructive and effective mitigation and enhancement. Please don't let an insufficient enhancement plan stop the progress that has been made thus far.	12000 - Relationships to other federal laws and policies, 35030 - Applicants' MEP (specific to NCA), 35040 - Recommendations for MEP changes
101238	1	1	SNAKE RIVER RANCH, LLC,C DALE WILLIS JR	B = Business or Business Group	QC complete	After years of work, the Bureau of Land Management (BLM), and the Power Companies (Idaho Power and Rocky Mountain Power) who will finance and build the project, have agreed to routing Segment 8 through Morley Nelson Birds of Prey- NCA. Their agreement, as now proposed, will eliminate millions of dollars of economic damage to our great state which would have occurred had earlier route selections been finalized through private farms, dairies, prime development land and near Kuna and Melba. There is no need to look at any other routes and I approve the proposed Segment 8 route that the Regional Advisory Committee (RAC) has proposed. The RAC has spent hundreds of hours and thousands of dollars in reviewing various routes and concluded on the	25000 - Socioeconomics, 25050 - Community/city development and expansion, 25060 - Agriculture, 34010 - Private Land/Land Ownership, 34020 - County and City Plans/Zoning, 50010 - Segment 8 – Applicants' Proposed Route, 58000 - General project effects on State (Idaho)

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						proposed location through the NCA. PLEASE DO NOT CHANGE THE ROUTE FROM THE NCA	
101253	1	1	JOAHN MAGLECIC	I = Individual (s) not affiliated	QC complete	I feel like they need to stay away from private land.	34011 - Site the line on public land
101252	1	0	KATHRYN ALDER	I = Individual (s) not affiliated	QC complete	As an outgoing RAC member and as a farmer, "There is "absolutely" no need to look at any other routes, and I approve the proposed segment 8 route that the RAC has proposed. The RAC has spent hundreds of hours and dollars in reviewing all the information. Please approve segment 8 and move on -	50010 - Segment 8 – Applicants' Proposed Route
101246	1	1	GEORGE A BOUVIER	I = Individual (s) not affiliated	QC complete	The transmission line needs to be run through the Birds of Prey. The modern construction would turn out to be an asset to the birds & wildlife.	28000 - Wildlife (general), 28020 - Raptors/Eagles/Ravens, 50010 - Segment 8 – Applicants' Proposed Route, 51010 - Segment 9 – Applicants' Proposed Route, 48000 - Design Features
101246	3	1	GEORGE A BOUVIER	I = Individual (s) not affiliated	QC complete	Running it through Kuna and Melba residential & farmland would be a disaster to the area.	25000 - Socioeconomics, 25060 - Agriculture, 34010 - Private Land/Land Ownership
101268	1	1	GABIOLA LAND COMPANY LLC,ALBERT GABIOLA	B = Business or Business Group	QC complete	The Gabiola Land Company owns a 120 acre tract of line close to the proposed transmission line project. The legal description of the land is NW 1/4 and S 1/2, NW 1/4, Sec.29, T.1N, R.2E, B.M, Parcel Number S2029220000, Ada County. We prefer that the final route of the transmission be the route furthest from our land so as to minimize the adverse visual and economic impacts on our property.	23000 - Visual Resources, 25000 - Socioeconomics, 50000 - Segment 8 General
101289	1	1	SNAKE RIVER RANCH, LLC,KATHLEEN ZOLDOS	I = Individual (s) not affiliated	QC complete	there is no need to look at any other routes and I approve the proposed Segment 8 route that the Regional Advisory Committee (RAC) has proposed. The RAC has spend hundreds of hours and thousands of dollars in reviewing various routes and concluded on the proposed location through the NCA. PLEASE DO NOT CHANGE THE ROUTE FROM THE NCA.	50010 - Segment 8 – Applicants' Proposed Route
101227	1	1	LEAH D OSBORN	I = Individual (s) not affiliated	QC complete	"Raptor Expert Morley Nelson assisted PP&L with routing the line so it would not adversely affect raptors and with the designing platforms for transmission towers that would encourage raptor nesting(Nelson and Nelson 1976, Nelson 1982)." This quote came from page 30 of the Draft Mitigation and Enhancement Portfolio Proposal. The enhancement package really needs to do the most possible to address the BIRDS in this area! This whole Gateway West process has been going on for about 6 years....I absolutely support Segment 9 through the BOPNCA. This route needs to be finalized we have come a long way.	28020 - Raptors/Eagles/Ravens, 35030 - Applicants' MEP (specific to NCA), 35040 - Recommendations for MEP changes, 51010 - Segment 9 – Applicants' Proposed Route, 48000 - Design Features
101225	1	1	US NATIONAL PARK SERVICE, INTERMOUNTAIN REGION,TAMMY WHITTINGTON	G = Government	QC complete	The NPS encourages the Bureau of Land Management (BLM) to make every effort to ensure that transmission lines are constructed and operated in an environmentally responsible manner that serves the public interest, protects cultural and natural resources, and protects our treasured landscapes. While the NPS supports the development and modernization of our nation's energy grid, we maintain that it can and should be done using the least environmentally impactful methods.	16000 - Generally support project, 24000 - Cultural Resources
101225	2	1	US NATIONAL PARK SERVICE, INTERMOUNTAIN REGION,TAMMY WHITTINGTON	G = Government	QC complete	NPS recommends the use of the BLM Preferred Alternatives in the vicinity of Hagerman Fossil Beds National Monument (the Monument). If other routes closer to the Monument come under consideration, the NPS may have concerns about visual resources, visitor access during construction, and increased vandalism and theft of resources with off highway vehicles (OHV) and horseback use of new access roads. The NPS requests early interagency coordination with the BLM if there are new developments in potential routes in the vicinity of the Monument.	12000 - Relationships to other federal laws and policies, 23000 - Visual Resources, 36000 - Recreation, 36020 - Off Road Vehicles/OHV, 38000 - Transportation, 50020 - Segment 8 – Routes considered in the 2013 FEIS, 51020 - Segment 9 – Routes considered in the 2013 FEIS
101225	3	1	US NATIONAL PARK SERVICE, INTERMOUNTAIN REGION,TAMMY WHITTINGTON	G = Government	QC complete	The NPS encourages the BLM to continue active coordination to protect the visitor experience at Oregon National Historic Trail remnants throughout western Idaho, particularly at intact segments such as those in Hagerman	12000 - Relationships to other federal laws and policies, 19000 - Mitigation (general), 34010 - Private Land/Land Ownership, 36000 - Recreation, 24010 - Historic Trails

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						Fossil Beds National Monument and in the vicinity of Three Island Crossing State Park, and wherever they occur on other public and private lands.Regardless of the alternatives selected, the proposed project will have significant, adverse impacts on the National Historic Trails through Idaho. Although it is too soon to discus's mitigation, NPS would urge BLM to ensure that mitigation to the Oregon National Historic Trail would be commensurate to the impacts.	
101225	4	1	US NATIONAL PARK SERVICE, INTERMOUNTAIN REGION,TAMMY WHITTINGTON	G = Government	QC complete	Regarding Segment 8, the BLM Preferred Alternative appears to correspond closely to the North Trail Segment of the Oregon National Historic Trail (NHT), which is shown on NPS brochures as a "segment of the trail offering the best visitor experiences," and which is also a designated High Potential Segments of the trail. High Potential Segments, according to the National Trails System Act, are "those segments of a trail which would afford high quality recreation experience in a portion of the route having greater than average scenic values or affording an opportunity to vicariously share the experience of the original users of a historic route." NHTs also are components of the National Landscape Conservation System, which under BLM Handbook 6280, are supposed to be protected from development. The Proposed Alternative, on the other hand, would include a perpendicular crossing of the Oregon NHT and may have the potential to impact part of the southern route of the Oregon Trail.	12000 - Relationships to other federal laws and policies, 36000 - Recreation, 24010 - Historic Trails, 50010 - Segment 8 – Applicants' Proposed Route, 50020 - Segment 8 – Routes considered in the 2013 FEIS
101225	5	1	US NATIONAL PARK SERVICE, INTERMOUNTAIN REGION,TAMMY WHITTINGTON	G = Government	QC complete	Regarding Segment 9, the BLM Preferred Alternative appears to intersect the Oregon NHT from the Kings Hill area to where the proposed transmission line turns west to pass over Birds of Prey. However, when using the BLM interactive map on the project website, it is difficult to determine exactly where the proposed line would intersect and/or impact the NHT. NPS requests that BLM provide us geographical layers of the proposed transmission line so that we can better determine the locations where the proposed transmission line and the NHT would intersect.	24010 - Historic Trails, 51020 - Segment 9 – Routes considered in the 2013 FEIS
101291	1	1	SNAKE RIVER ALLIANCE,KEN MILLER	S = Special Interest Group	QC complete	However, we join other commenters who have expressed concerns about how this proposed transmission project meets the requirements contained in the language establishing this NCA.	12000 - Relationships to other federal laws and policies, 35010 - Enhancement requirements
101291	2	1	SNAKE RIVER ALLIANCE,KEN MILLER	S = Special Interest Group	QC complete	Effects on wildlife habitat, plants and animals, including threatened, endangered, and sensitive species;	27000 - Vegetation, 27010 - Special Status Plants, 28000 - Wildlife (general), 28060 - Other Special Status Wildlife, 28080 - Threatened/Endangered Species
101291	3	1	SNAKE RIVER ALLIANCE,KEN MILLER	S = Special Interest Group	QC complete	Effects to visual resources and existing view sheds;	23000 - Visual Resources
101291	4	1	SNAKE RIVER ALLIANCE,KEN MILLER	S = Special Interest Group	QC complete	Land use conflicts and consistency or inconsistency with existing federal (BLM) land use plans as well as state and private lands, including the Morley Nelson Snake River Birds of Prey National Conservation Area (NCA);	34010 - Private Land/Land Ownership, 34030 - Federal land Use Plans, 35000 - NCA/SRBOP (general)
101291	5	1	SNAKE RIVER ALLIANCE,KEN MILLER	S = Special Interest Group	QC complete	Reliability of the transmission infrastructure, particularly in southwest Idaho.	11000 - Purpose and Need for the Project
101291	6	1	SNAKE RIVER ALLIANCE,KEN MILLER	S = Special Interest Group	QC complete	More specifically, the Alliance recommends that BLM, as part of its crafting of this Supplemental Environmental Impact Statement, explore in more detail "The purposes for which the conservation area is established, and shall be managed, are to provide for the conservation, protection and enhancement of raptor populations and habitats and the natural and environmental resources and values associated therewith, and of he scientific, cultural, and educational resources and values of the public land in the conservation area." We recommend that BLM and the proponents better describe how the installation of a high-voltage transmission line across this NCA adheres to the above prescriptions and how this proposed transmission line advances the purposes of the establishment of this NCA.	12000 - Relationships to other federal laws and policies, 35010 - Enhancement requirements
101291	7	1	SNAKE RIVER ALLIANCE,KEN MILLER	S = Special Interest Group	QC complete	It is clear from the record that there are fundamental differences on potential avian impacts in important areas should this project move forward. We offer	28020 - Raptors/Eagles/Ravens

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						no expertise, but we recommend that this environmental analysis includes science-based, defensible examinations of those impacts.	
101291	8	1	SNAKE RIVER ALLIANCE,KEN MILLER	S = Special Interest Group	QC complete	We are pleased that the Western Electric Coordinating Council (WECC) has reduced the separation distance between parallel transmission lines to 250 feet.	48000 - Design Features
101291	9	1	SNAKE RIVER ALLIANCE,KEN MILLER	S = Special Interest Group	QC complete	We are also pleased that BLM has considered changes to the proposed alignments as recommended by its RAC.	50010 - Segment 8 – Applicants' Proposed Route, 51010 - Segment 9 – Applicants' Proposed Route
101291	10	1	SNAKE RIVER ALLIANCE,KEN MILLER	S = Special Interest Group	QC complete	The Alliance also believes that the proponent utilities (Idaho Power, Rocky Mountain Power, and Bonneville Power Administration) will remain liable for any required restoration required by any or all disturbances, and that any such restoration is undertaken in such a way that eliminates the possibility of transmission of invasive plant or animal species.	27020 - Invasive Plants/weeds, 28000 - Wildlife (general)
101291	11	1	SNAKE RIVER ALLIANCE,KEN MILLER	S = Special Interest Group	QC complete	We have numerous concerns regarding how these two proposed Segments 8 and 9 will traverse private, state, and federal properties and we expect those issues will be addressed in the DSEIS.	34010 - Private Land/Land Ownership
101291	12	1	SNAKE RIVER ALLIANCE,KEN MILLER	S = Special Interest Group	QC complete	We ask BLM to conduct a more thorough analysis of why this NCA was created and what, specifically, the Department of Interior, as the curator of this important NCA, has done to ensure its future successes. There are only sparse references to the history of this important wildlife area, and a weaker record of actions by the Proponents to defend and protect the lands for which these agencies have been entrusted.	35000 - NCA/SRBOP (general)
101291	13	1	SNAKE RIVER ALLIANCE,KEN MILLER	S = Special Interest Group	QC complete	The Alliance asks BLM and the Utility Proponents to demonstrate how the establishment of additional transmission lines through and across the Snake River Birds of Prey National Conservation Area as approved by the 103rd Congress within Public Law 103-64 comports with the Act's language above or, in the alternative, how this proposal does not comport with the language in the Act. We also recommend that the DSEIS address specifically the above paragraph, and how this project will conserve, let alone protect, native raptors within the NCA.	12000 - Relationships to other federal laws and policies, 28020 - Raptors/Eagles/Ravens, 35000 - NCA/SRBOP (general)
101291	14	1	SNAKE RIVER ALLIANCE,KEN MILLER	S = Special Interest Group	QC complete	We recommend to BLM that it explore in greater depth possible impacts to known raptor nests and roosts as reflected in Figure E 10-6. It is clear that, as would be expected in and adjacent to the NCA, there is considerable raptor activity between the two proposed segments, and we expect the DSEIS will examine possible impacts in detail. It appears that the proposed Segments 8 and 9 will avoid to the extent possible known Greater Sage-grouse leks ads well as most of the sagebrush habitat (in the Case of Segment 9). As with possible impacts to raptors, we expect possible impacts to sage-grouse to be fully examined.	28020 - Raptors/Eagles/Ravens, 28070 - Sage-grouse, 51010 - Segment 9 – Applicants' Proposed Route
101291	15	1	SNAKE RIVER ALLIANCE,KEN MILLER	S = Special Interest Group	QC complete	Regarding Segment 8, we are relieved that the Proposed Route south of Owyhee, would take the line further from impacting the Kuna area. The Deferred Decision Route that would have run north of Owyhee and much closer to the Kuna community was unacceptable.	50010 - Segment 8 – Applicants' Proposed Route, 50020 - Segment 8 – Routes considered in the 2013 FEIS
101291	16	1	SNAKE RIVER ALLIANCE,KEN MILLER	S = Special Interest Group	QC complete	Finally, the Alliance asks that BLM, in its forthcoming DSIES, describe how these proposed Segments 8 and 9 fit into that portion of the Gateway West transmission project that has already been approved by the federal agencies.	10000 - Conformance with the NEPA process
101291	17	1	SNAKE RIVER ALLIANCE,KEN MILLER	S = Special Interest Group	QC complete	Regardless of which routes are finally proposed by BLM and the Proponents, we believe it is of the utmost importance that all actions taken by the Utility Proponents are thoroughly and transparently examined by a third party. If this agreement is approved, we join our colleagues in insisting that the implementation of the terms of the agreement are upheld. We expect that Idaho Power provides some of the financing for this 3rd-Party evaluation, particularly as it relates to promised habitat restoration [as contained in the	35010 - Enhancement requirements

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						eventual agreement] and also as it relates to law enforcement to ensure the conditions of this agreement remain intact	
101291	18	1	SNAKE RIVER ALLIANCE,KEN MILLER	S = Special Interest Group	QC complete	It is possible that this proposal may require amendment of one or more BLM land use plans or management framework plans. Should that occur, we agree with BLM that "the BLM will integrate the land use planning process with the NEPA analysis process for this project."	34030 - Federal land Use Plans
101254	1	1	SUSAN KELLY	I = Individual (s) not affiliated	QC complete	I have seen the proposed BLM line which runs very near to my home as well as Idaho Power's proposed line. I am for the Idaho Power line. These are currently lines closer to the Swan Falls area and it makes more sense to keep the line away from the humans that live in my area. I purchased my land for the views and do not want a view of a large power line. Please move the line south to Swan Falls area.	23000 - Visual Resources, 34010 - Private Land/Land Ownership, 50010 - Segment 8 – Applicants' Proposed Route, 50020 - Segment 8 – Routes considered in the 2013 FEIS
101254	2	1	SUSAN KELLY	I = Individual (s) not affiliated	QC complete	My dog, my family & the community of Kuna use the current BLM land south of Kuna for various sports including hiking, cross country running, biking, four wheeling. It would be a shame to expose it to industrial line that can be moved to areas less used by the community.	25050 - Community/city development and expansion, 36000 - Recreation, 36010 - Trails, 36020 - Off Road Vehicles/OHV, 57000 - General project effects on Counties
101254	3	1	SUSAN KELLY	I = Individual (s) not affiliated	QC complete	We are situated at the west end of Kuna mora south two miles of Kuna. We are directly impacted by the proposed line. Please consider moving the lines further south of our home.	34010 - Private Land/Land Ownership, 50010 - Segment 8 – Applicants' Proposed Route
101259	1	1	RICHARD & SUE FARNER	I = Individual (s) not affiliated	QC complete	I strongly encourage you to stay with-in your comments "There is no need to look at any other routes and I approve the proposed Segment 8 route that the RAC has proposed. The RAC has spent hundreds of hours and thousands of dollars in reviewing various routes and concluded on the proposed location through the NCA. Please do not change the route from the NCA.	50010 - Segment 8 – Applicants' Proposed Route
101261	1	1	REED A & GEORGIA A SMITH	I = Individual (s) not affiliated	QC complete	I support the Birds of Prey routes for segments 8 & 9 for the Gateway West Transmission Line.	50010 - Segment 8 – Applicants' Proposed Route, 51010 - Segment 9 – Applicants' Proposed Route
101261	2	1	REED A & GEORGIA A SMITH	I = Individual (s) not affiliated	QC complete	Because the original route on private land would have completely blocked my over the air TV reception at Oreana.	34010 - Private Land/Land Ownership, 40000 - Electrical Environment
101261	3	1	REED A & GEORGIA A SMITH	I = Individual (s) not affiliated	QC complete	Besides protecting Killer birds was never a good idea. (Bird of prey) Contributors to the demise of the sage grouse and all bug eating birds which cause half dead forests which burn easier.	28000 - Wildlife (general), 28070 - Sage-grouse, 41000 - Public Safety
101270	1	1	MARCY PETERSON	I = Individual (s) not affiliated	QC complete	these segments 8 and 9 need to go north of the Snake River using the existing energy corridor which already functions without invading private property owners, endangering species or our scenic, pristine vistas and property values.	23000 - Visual Resources, 25030 - Property Values, 28080 - Threatened/Endangered Species, 34010 - Private Land/Land Ownership, 50010 - Segment 8 – Applicants' Proposed Route, 51010 - Segment 9 – Applicants' Proposed Route
101270	2	1	MARCY PETERSON	I = Individual (s) not affiliated	QC complete	our health (sorry but many of us are not convinced that living under these high energy lines is safe or wise and why would you risk THAT?)	41000 - Public Safety
101270	3	1	MARCY PETERSON	I = Individual (s) not affiliated	QC complete	To protect our wildlife, particularly the endangered Sage Grouse! The Sage Grouse must co-habitate great with cattle or they would not have survived HERE all these years! But if you put Powerlines over here for the raptures to hung from the Sage Grouse plus all the rest of our game birds will diminish. The Raptors are over here hunting all the time.	28020 - Raptors/Eagles/Ravens, 28070 - Sage-grouse
101270	4	1	MARCY PETERSON	I = Individual (s) not affiliated	QC complete	Others Reasons for segments 8 + 9 to be North of the Snake River: 1. Time. It is faster. It is shorter. It is much more Level and there are already dirt Rds there. IT is easier to access for building and maintenance.	38000 - Transportation, 50010 - Segment 8 – Applicants' Proposed Route, 51010 - Segment 9 – Applicants' Proposed Route, 48000 - Design Features
101270	5	1	MARCY PETERSON	I = Individual (s) not affiliated	QC complete	Also, in case of, no, when there is a sudden brush fire it will be better, quicker north of the River to control!	41000 - Public Safety
101270	6	1	MARCY PETERSON	I = Individual (s) not affiliated	QC complete	Less Resistance. Save Time, money and effort. Less Resistance from People & elements. Save Time. Save Money. Do The Right Thing!	48000 - Design Features
101271	1	1	DONNA VENLTUIZEN	I = Individual (s) not affiliated	QC complete	90% of our traffic comes through the main entrance of Melba. Who would move here if the powerlines come through the main entrance>	25000 - Socioeconomics, 38000 - Transportation
101271	2	1	DONNA VENLTUIZEN	I = Individual (s) not affiliated	QC complete	You will destroy what little business we have here.	25000 - Socioeconomics

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101271	3	1	DONNA VENLTUIZEN	I = Individual (s) not affiliated	QC complete	You already have a solution, you already have powerlines south of Melba. Why cause more environmental impacts erecting them through Melba/ Kuna. We do hope you decide on the BLM proposal which will save our community.	50010 - Segment 8 – Applicants' Proposed Route
101262	1	1	RAE GRIMES	I = Individual (s) not affiliated	QC complete	Stay away from home and land with home [illegible] stay.	34010 - Private Land/Land Ownership
101263	1	1	JOAHN MAGLECIC	I = Individual (s) not affiliated	QC complete	I don't think gateway need to come on privit land.	34010 - Private Land/Land Ownership
101264	1	1	WILLIAM CHASTEEN	I = Individual (s) not affiliated	QC complete	Is it really needed?	11000 - Purpose and Need for the Project, 17000 - Generally oppose project
101264	2	1	WILLIAM CHASTEEN	I = Individual (s) not affiliated	QC complete	Why is Wyoming Power not included in a national grid of Elec. power. Our national grid should be upgraded for future generations not individual corporations. All transmission lines should be upgraded to 500 kV.. Right of ways are already in place - no need to take personal or private property out of existence. A free market will help improve for all. (MA Bell is a good example:) as a citizen of Idaho I should be able to buy power from Wells Dam, a Douglas County Washington Pud, if I wanted to.	10010 - Out of scope comments, 17000 - Generally oppose project
101264	3	1	WILLIAM CHASTEEN	I = Individual (s) not affiliated	QC complete	If BLM allows seg. 8 & 9 to go forth and any land restricted, BLM should open Public Lands for Development. To replace lost farm or private lands.	34011 - Site the line on public land, 35020 - Mitigation suggestions, 50000 - Segment 8 General, 51000 - Segment 9 – General
101264	4	1	WILLIAM CHASTEEN	I = Individual (s) not affiliated	QC complete	From Midpoint go northwest and follow existing line north of Gooding - North of King Hill - stay on BLM Grounds to south of Man Field. The line and right of way and all envoirmental prombems have already occurred.	50000 - Segment 8 General, 48000 - Design Features
101264	5	1	WILLIAM CHASTEEN	I = Individual (s) not affiliated	QC complete	If Idaho PWR is forced to go thru private property, BLM should request that Rocky Mtn. and Idaho Pwr pay for loss of private land or use of it.	34010 - Private Land/Land Ownership, 35020 - Mitigation suggestions
101264	6	1	WILLIAM CHASTEEN	I = Individual (s) not affiliated	QC complete	EPA, A corp of ENG, and BPA should be involved also in this proposal.	10000 - Conformance with the NEPA process
101266	1	1	GENE BORN	I = Individual (s) not affiliated	QC complete	I view the map's on segments 8 and 9 and like what was presented. I feel we have a nice route for The Transmission Line's, lets stop talking about it, wasting money and time and set the project in motion.	50010 - Segment 8 – Applicants' Proposed Route, 51010 - Segment 9 – Applicants' Proposed Route
101216	1	1	PEGGY ROBINSON	I = Individual (s) not affiliated	QC complete	I approve the Boise RAC route - It avoids my property in Oreana	34010 - Private Land/Land Ownership, 51010 - Segment 9 – Applicants' Proposed Route
101294	2	1	LOUIS MONSON	I = Individual (s) not affiliated	QC complete	We already have one hi voltage power transmission line running over the subdivision and there is no way we will allow another hi voltage power transmission line to further degrade our property values. Our property values have gone down with the increase in size of the substation and the current transmission line.	25030 - Property Values, 34010 - Private Land/Land Ownership
101294	1	1	LOUIS MONSON	I = Individual (s) not affiliated	QC complete	I am writing this comment to voice our displeasure and opposition to the placement of SEGMENT 8 from mile 126 to its terminus at the Wilson (Hemingway) Idaho Power Sub Station . The routing of the line is right thru the China Ditch subdivision. It parallels Trail Drive Road and is in a dry river bed. (which is not always "Dry").	33000 - Water Resources and Use, 50010 - Segment 8 – Applicants' Proposed Route
101300	1	1	CITY OF MELBA, PLANNING AND ZONING COMMISSION,JANICE SCHACHTER-CHANEY	I = Individual (s) not affiliated	QC complete	If these transmission lines come through Melba Road, not only will they take farms away, businesses will not want to come to Melba and certainly new houses will not be built.	25000 - Socioeconomics, 25050 - Community/city development and expansion, 25060 - Agriculture, 34020 - County and City Plans/Zoning
101300	2	1	CITY OF MELBA, PLANNING AND ZONING COMMISSION,JANICE SCHACHTER-CHANEY	I = Individual (s) not affiliated	QC complete	Also, through Birds of Prey, there are already transmission lines, and the sage grouse have thrived. Why can't the lines go through there?	28070 - Sage-grouse, 50010 - Segment 8 – Applicants' Proposed Route, 48000 - Design Features
101300	3	1	CITY OF MELBA, PLANNING AND ZONING COMMISSION,JANICE SCHACHTER-CHANEY	I = Individual (s) not affiliated	QC complete	Segment 8, Route down Melba Road to the highway and over to the river. If the farm land is confiscated, will the farmers get a fair price?	25030 - Property Values, 25060 - Agriculture, 50000 - Segment 8 General
101301	1	1	JAMES & JANE TAYLOR	I = Individual (s) not affiliated	QC complete	Concerned of the south route, north of Murphy Airport, crossing highway 78. Very dangerous, low light levels and at night.	23000 - Visual Resources, 41000 - Public Safety, 51010 - Segment 9 – Applicants' Proposed Route
101301	2	1	JAMES & JANE TAYLOR	I = Individual (s) not affiliated	QC complete	I am a han radio operator in Guffey, will it infringe on my radio transmissions?	40000 - Electrical Environment
101302	1	1	STEVE KAUFMAN	I = Individual (s) not affiliated	QC complete	Follow the existing line (Segment 8) on federal land.	50000 - Segment 8 General
101299	1	1	DOUG HIPWELL	I = Individual (s) not affiliated	QC complete	Prefer the route we agreed on originally, the agreed upon line, parallels existing lines on federal land (Segment 8).	50020 - Segment 8 – Routes considered in the 2013 FEIS

Letter #	Comment #	Signatures	Letter owners	Group	Coding status	comment	category
101269	1	1	OREGON-CALIFORNIA TRAILS ASSOCIATION, IDAHO CHAPTER,WALLY MEYER	S = Special Interest Group	QC complete	Where the transmission line must cross the routes of the Oregon or CAlifornia National Historic Trails, utilize trail route sections already disturbed by other developments and where no historic trail remnants exist. Where the transmission line must parallel the route or a historic trail, utilize existing transmission line corridors, or in situations where there are no existing transmission lines, avoid infringing upon the viewshed, seen from historic trail remnants.	23000 - Visual Resources, 24010 - Historic Trails, 48000 - Design Features
101269	2	1	OREGON-CALIFORNIA TRAILS ASSOCIATION, IDAHO CHAPTER,WALLY MEYER	S = Special Interest Group	QC complete	After reviewing the EIS's National Historic Trails map, it appears the proposed route will cross of come in very close proximity to trail remnants in the following areas: 1) Big Hill 2) Cedar Mtn to Bradley Mtn on Hudspeths Cutoff 3) Raft River 4) North of Glenn's Ferry 5) C.J. Strike Reservoir 6) and the Murphy Flat - Rabbit Creek area. Idaho Power has adjusted the route of the transmission line to minimize adverse impacts on the South Alternate Oregon Trail in the Murphy Flat - Rabbit Cr. area. Hopefully, [illegible] route adjustments have or can be made in the other areas.	18000 - Comments on segments 1 to 7 & 10, 24010 - Historic Trails, 50000 - Segment 8 General, 51000 - Segment 9 – General, 48000 - Design Features
101269	3	1	OREGON-CALIFORNIA TRAILS ASSOCIATION, IDAHO CHAPTER,WALLY MEYER	S = Special Interest Group	QC complete	The proposed route from Glenn's Ferry to Indian Creek follows an existing powerline corridor, and construction should have minimal impact on viewshed seen from the Oregon Trail.	23000 - Visual Resources, 24010 - Historic Trails, 50010 - Segment 8 – Applicants' Proposed Route
101269	4	1	OREGON-CALIFORNIA TRAILS ASSOCIATION, IDAHO CHAPTER,WALLY MEYER	S = Special Interest Group	QC complete	The proposed transmission line route on the north or east side of the Snake River may have only a minimal impact upon views seen from the south ALT Oregon Trail.	23000 - Visual Resources, 24010 - Historic Trails, 51010 - Segment 9 – Applicants' Proposed Route
101269	6	1	OREGON-CALIFORNIA TRAILS ASSOCIATION, IDAHO CHAPTER,WALLY MEYER	S = Special Interest Group	QC complete	The Idaho Chapter of OCTA supports the Gateway West Programatic Statement for historic preservation, the cultural Resources Protection Plan, and the off-site mitigation projects proposed by Idaho Power to compensate for unavoidable impacts to historic and archeological resources from the Gateway West transmission line project.	19000 - Mitigation (general), 24000 - Cultural Resources, 24010 - Historic Trails
101226	1	2	TEENA LEWIS	I = Individual (s) not affiliated	QC complete	My husband & I are in agreement with the Idaho Power proposed route in the Snake River Birds of Prey (NOA) for section 9 of the Gateway West Project. Keep it off the private lands and keep in on the existing public lands where the lines already are.	34010 - Private Land/Land Ownership, 34011 - Site the line on public land, 51010 - Segment 9 – Applicants' Proposed Route
101217	1	1	JERRY L AND MARY LOU TLUCEK	I = Individual (s) not affiliated	QC complete	We own several farms near Melba where Summer Lake Power already exists We have that power lines through over one mile of farm propeitys now. We have several pivots installed that would be affected if this proposed power line was installed 250 feet from the summer Lake Power line exists. Unless this new power line would not be installed over the top of the summer lake line, we will do everything we can to oppose this new line.	37000 - Agriculture (includes crop production, dairies, cattle feedlots, and grazing), 50010 - Segment 8 – Applicants' Proposed Route, 48000 - Design Features
101218	1	1	CITY OF GRAND VIEW,FRANKLIN D HART	G = Government	QC complete	the Grand View City Council offers this letter of support for the Gateway West Transmission Line Project's new proposed routes for segments 8 and 9.	16000 - Generally support project, 50010 - Segment 8 – Applicants' Proposed Route, 51010 - Segment 9 – Applicants' Proposed Route
101218	2	1	CITY OF GRAND VIEW,FRANKLIN D HART	G = Government	QC complete	Grand View appreciates the new routes, documented on the attached Bureau of Land Management map, titled, Transmission Line Project, Segments 8 and 9 Overview, Appendix A - 1, and, believes them to be the most land owner and environmentally friendly, as previously analyzed in the final EIS and reflected as feasible alternative locations.	34010 - Private Land/Land Ownership, 50010 - Segment 8 – Applicants' Proposed Route, 51010 - Segment 9 – Applicants' Proposed Route
101209	1	1	BOYD ANDERSON	I = Individual (s) not affiliated	QC complete	I don't know of one elected official who is in support of Gateway going through private property. I think Frank Priestley, President of Idaho Farm Bureau, is correct in his article, which I have attached. I am in the process of changing our property from residential to Commercial, with the intent of putting in an airport. If Gateway comes down Barker road, it would be impossible to do as the take off and landing would be impossible with the high power lines. Please consider this in your planning, and stay off of private property as much as possible.	34010 - Private Land/Land Ownership, 34011 - Site the line on public land, 38000 - Transportation, 50020 - Segment 8 – Routes considered in the 2013 FEIS

Letter #	Comment #	Signatures	Letter owners	Group	Coding status	comment	category
101293	1	1	GABIOLA LAND COMPANY LLC,ALBERT GABIOLA	B = Business or Business Group	QC complete	I would like to know the distance from our land to the the " Proposed Route" and the "Deferred Decision Route" as the transmission line will have a visual impact on future development of our land.	23000 - Visual Resources, 34010 - Private Land/Land Ownership
101298	1	1	CON ZEYER	I = Individual (s) not affiliated	QC complete	I farm and would be very much approved of Applicants' proposed Segment 8 route.	37000 - Agriculture (includes crop production, dairies, cattle feedlots, and grazing), 50010 - Segment 8 – Applicants' Proposed Route
101297	3	1	KUNA HISTORICAL SOCIETY,SHARON FISHER	I = Individual (s) not affiliated	QC complete	Also glad that the lines can now be just 250m apart so they don't take up so much space in the NCA.	35000 - NCA/SRBOP (general), 48000 - Design Features
101297	4	1	KUNA HISTORICAL SOCIETY,SHARON FISHER	I = Individual (s) not affiliated	QC complete	You should talk to Eriks Garsvo of the Canyon County Historical Museum in Nampa. He's done a lot of work recently on mapping stage lines between Kuna and Silver City, and determine where there's still traces, and it would be good if the line didn't go through them. Perhaps mitigation could be involved. I assume you're also talking to the Owyhee County Museum people to check on the historic trails in their region as well. The historic trails map you had here was just too small to be able to tell.	19000 - Mitigation (general), 24010 - Historic Trails
101297	1	1	KUNA HISTORICAL SOCIETY,SHARON FISHER	I = Individual (s) not affiliated	QC complete	In general, like this one *much* better than the previous preferred alternative that cut through Kuna land and went through downtown Melba.	50010 - Segment 8 – Applicants' Proposed Route
101297	2	1	KUNA HISTORICAL SOCIETY,SHARON FISHER	I = Individual (s) not affiliated	QC complete	Happy to see that while it goes near Celebration Park and Guffey Bridge, it doesn't seem to impact them much. I do wonder how close it's going to the Halverson Bar cultural area and I hope you're working with the Canyon County people to determine that.	24000 - Cultural Resources, 36000 - Recreation
101208	1	1	LON P & MARY ELLEN BOTTS	I = Individual (s) not affiliated	QC complete	We would much prefer that FEIS alt 8-C remain out of consideration. We already have 1 major power line that was in place when we purchased our land. We are not interested in any more.	34010 - Private Land/Land Ownership, 50020 - Segment 8 – Routes considered in the 2013 FEIS
101296	1	1	JOHN WIND	I = Individual (s) not affiliated	QC complete	The reason I'm concerned about high voltage power lines coming close to our dairy site because of the stray voltage associated with power lines. It would not be good for the operation because in California, my operation near a high power line caused a major reduction in milk production of our cows. It is hard to detect the stray voltage. The best thing that ever happened was to move out of California and move to here where there are wide open spaces. By moving here, away from the power lines in California cured the stray voltage problems in the herd.	25060 - Agriculture, 37000 - Agriculture (includes crop production, dairies, cattle feedlots, and grazing), 40000 - Electrical Environment
101248	1	1	RICK & KRISTI MORINO	I = Individual (s) not affiliated	QC complete	I think the new segment 8 is much better improvement than the first drafts. Thanks for the update. It looks like the new route follows some of the previous transmission line routs. I think keeping the large towers outside the areas of town is a better choice.	34020 - County and City Plans/Zoning, 50010 - Segment 8 – Applicants' Proposed Route, 48000 - Design Features
101237	1	1	USDA NATURAL RESOURCES CONSERVATION SERVICE,JEFF BURWELL	G = Government	QC complete	I am pleased to report that the proposed route for segments 8 and 9 would not affect any NRCS conservation easements.	50010 - Segment 8 – Applicants' Proposed Route, 51010 - Segment 9 – Applicants' Proposed Route
101245	1	1	SNAKE RIVER RANCH, LLC,C DALE WILLIS JR	B = Business or Business Group	QC complete	I am writing this email to confirm our approval for the proposed route for Segment 8 through the Morley Nelson Snake River Birds of Prey NCA. It only makes sense to construct the line adjacent to the existing 500 KV line that currently runs through the NCA.	50010 - Segment 8 – Applicants' Proposed Route, 48000 - Design Features
101245	2	1	SNAKE RIVER RANCH, LLC,C DALE WILLIS JR	B = Business or Business Group	QC complete	The proposed route would have fewer economic and environmental impacts than running it through private lands and adjacent to populated areas in Boise, Kuna, and Melba.	25000 - Socioeconomics, 34010 - Private Land/Land Ownership
101295	1	0	IDAHO PRESS-TRIBUNE,BOB ATKINSON	B = Business or Business Group	QC complete	I was calling because I was trying to get some more information about the Gateway West project.	10010 - Out of scope comments
101244	1	1	MICHAEL STUKEL	I = Individual (s) not affiliated	QC complete	I'm in favor of the new PROPOSED ROUTE for Segment 8, which utilizes BLM land. Overall, the power project is for public benefit and the route should favor public land.	34011 - Site the line on public land, 50010 - Segment 8 – Applicants' Proposed Route

Letter #	Comment #	Signatures	Letter owners	Group	Coding status	comment	category
101244	2	1	MICHAEL STUKEL	I = Individual (s) not affiliated	QC complete	With all the public land available it seems silly to make private landowners shoulder the burden of this project. The negative economic impact to me would be substantial.	34010 - Private Land/Land Ownership
101236	1	1	ROBERT E KNAPP	I = Individual (s) not affiliated	QC complete	As a property owner in Melba, Idaho I do not want the Gateway West Transmission line in our community. This is an area of farms and small acreage parcels that will continue to grow and I do not approve of it coming through Melba. It should go on the proposed route (red line) to the south of town.	25050 - Community/city development and expansion, 25060 - Agriculture, 34010 - Private Land/Land Ownership, 50010 - Segment 8 – Applicants' Proposed Route
101207	1	1	GLENN RODGERS	I = Individual (s) not affiliated	QC complete	I own some land there on the corner of, just north of Melba on Southside Drive and Belmont. I had a question about the proposed alternative route going through Melba, if that would go along South Side Drive, or where would that be located?	34010 - Private Land/Land Ownership, 50010 - Segment 8 – Applicants' Proposed Route
101232	1	1	RANDY SHEPARD	I = Individual (s) not affiliated	QC complete	As I stand on my deck at 2298 Bench Road Montpelier Idaho, and look out at the mountains, I realize that not far into the future I will have your towers and lines blocking everything which is beautiful about our home. When I talked to one of your employees a while back, he said there is nothing I can do about it, because your lines don't go over my property....just very near it. Lines are one thing but staring at the towers is not desirable.	18000 - Comments on segments 1 to 7 & 10, 23000 - Visual Resources, 34010 - Private Land/Land Ownership
101232	2	1	RANDY SHEPARD	I = Individual (s) not affiliated	QC complete	After your tower and lines are up, we will just be an old home on Baltic avenue, as far as the game of Monopoly is compared. As you gain your new avenues to sell and move power, I will loose in value, what ever my home might be worth. The old building is a historical building in the area for those who have lived there for generations. It started as a school built around 1910, then it was an armory for the military, then a dance hall and a moose lodge. The it became a church for Christian services, before it became a cabinet shop and then our home around 1995. I realize that the deal with your power lines are kind of one sided,....imagine if you were in my shoes...how would you feel? Wouldn't you seek assistance from attorneys? I await your thoughts on this matter, I'm sure that I have little resources compared to your legal teams, but one could hope they can appeal to reason and fairness, even in a world of stone hearts.	17000 - Generally oppose project, 18000 - Comments on segments 1 to 7 & 10, 24000 - Cultural Resources, 25030 - Property Values

APPENDIX C
PUBLIC NOTICES

Appendix C-1
Notice of Intent to Prepare an SEIS

Respondents: Individuals.

Number of Respondents: 8,000 per year, on average.

Total Number of Responses: 8,000 per year, on average.

Frequency of Response: Once.

Estimated Time per Response: 1 hour.

Estimated Total Annual Hour Burden: 8,000 hours.

Estimated Total Annual Non-Hour Dollar Cost: $0.

Dated: September 15, 2014.

Christine Cho,

Acting Deputy Director for Information Resources.

[FR Doc. 2014–22440 Filed 9–18–14; 8:45 am]

BILLING CODE 4310–4J–P

DEPARTMENT OF THE INTERIOR

Bureau of Land Management

[14XL LLWY9200000.L51010000.ER0000. LVRWK09K0990.241A.00; 4500069121; IDI–35849]

Notice of Intent To Prepare a Supplemental Environmental Impact Statement and Possible Land Use Plan Amendments for Segments 8 and 9 of the Gateway West 500-kV Transmission Line Project in Idaho

AGENCY: Bureau of Land Management, Interior.

ACTION: Notice.

SUMMARY: The Bureau of Land Management (BLM) Idaho State Office announces its intention to prepare a supplemental environmental impact statement (EIS) analyzing the potential impacts of approving a right-of-way (ROW) application for Segments 8 and 9 of the Gateway West 500-kilovolt (kV) Transmission Line Project and possible land use plan amendments. The supplemental EIS will be prepared in accordance with the National Environmental Policy Act of 1969, as amended (NEPA). The supplemental EIS is being prepared based on new information described in the **SUPPLEMENTARY INFORMATION** section of this notice. The BLM issued a Record of Decision (ROD) for the project on November 14, 2013. In that ROD, the BLM deferred offering a ROW grant for two of the 10 segments—Segments 8 and 9—to allow additional time for Federal, State, and local permitting agencies to examine additional options regarding siting route segments and mitigation and enhancement measures for those segments.

DATES: This notice initiates a 30-day public scoping period that will assist in the preparation of a draft supplemental EIS. Comments may be submitted in writing until October 20, 2014, or 15 days after the date of the last public scoping meeting, whichever is later.

To provide the public an opportunity to review the proposal and project information, the BLM expects to hold four public meetings in Idaho communities during the scoping period. The BLM will announce the exact dates, times, and locations for these meetings at least 15 days prior to each event. Announcements will be made by news release to the media, newsletter mailings, and posting on the project Web site listed below.

ADDRESSES: You may submit comments or resource information related to the project by any of the following methods:

- Web site: *http://www.blm.gov/id/st/en/prog/nepa_register/gateway-west.html*
- Email: *blm_id_gateway_west@blm.gov*
- Mail: Bureau of Land Management Idaho State Office, Gateway West Transmission Project, 1387 South Vinnell Way, Boise, ID 83709

FOR FURTHER INFORMATION CONTACT: Heather Feeney, BLM Boise District Office, 3948 Development Avenue, Boise, ID 83705; phone 208–384–3325; or email to *blm_id_gateway_west@blm.gov*. Contact Ms. Feeney if you wish to have your name added to the project mailing list. Persons who use a telecommunications device for the deaf (TDD) may call the Federal Information Relay Service (FIRS) at 1–800–877–8339 to contact Ms. Feeney during normal business hours. The FIRS is available 24 hours a day, 7 days a week, to leave a message or question with the above individual. You will receive a reply during normal business hours.

SUPPLEMENTARY INFORMATION: Documents pertinent to this proposal may be examined at:

- Bureau of Land Management, Idaho State Office, Public Room, 1387 South Vinnell Way, Boise, ID 83709, Telephone: 208–373–3863.
- Bureau of Land Management, Boise District Office, 3948 Development Avenue, Boise, ID 83705, Telephone: 208–384–3300.
- Online: *http://www.blm.gov/id/st/en/prog/nepa_register/gateway-west.html.*

PacifiCorp, dba Rocky Mountain Power, and Idaho Power (Applicants) have submitted a ROW application to locate 500-kilovolt (kV) electric transmission lines on Federal lands as part of the Gateway West Transmission Line Project. The initial application proposed to construct electric transmission lines from the Windstar Substation near the Dave Johnston Power Plant at Glenrock, Wyoming, to the Hemingway Substation near Melba, Idaho, approximately 20 miles southwest of Boise, Idaho. The original project comprised 10 transmission line segments with a total length of approximately 1,000 miles. The November 2013 ROD authorized routes on Federal lands for Segments 1 through 7 and Segment 10 but deferred a decision for Segments 8 and 9. The Applicants submitted a revised project application for Segments 8 and 9. This notice announces that the BLM, Idaho State Office, intends to prepare a supplemental EIS for Segments 8 and 9 of the Gateway West Transmission Line Project and begins the scoping process to seek public input on new issues and resource information related to Segments 8 and 9, described below. Analysis in the supplemental EIS will support a decision on whether to approve, approve with modifications, or deny the revised ROW application for Segments 8 and 9.

In November 2013, the BLM requested the Boise District Resource Advisory Council (RAC) to consider issues surrounding siting Segments 8 and 9 of the Gateway West Transmission Line Project. As proposed, these segments would traverse portions of the BLM Boise District in and around the Morley Nelson Snake River Birds of Prey National Conservation Area (NCA), as well as on private lands. The RAC, a citizen-based council chartered under Section 309 of the Federal Land Policy and Management Act (FLPMA) and the Federal Advisory Committee Act, advises and makes recommendations to the BLM on resource and public land management issues in southwestern Idaho. The RAC formed a subcommittee to examine options for resolving remaining issues associated with siting Segments 8 and 9. On June 5, 2014, the RAC provided the BLM with the report on alternative route options and resource considerations for Segments 8 and 9. On August 8, 2014, the Applicants formally adopted routes recommended by a majority of the subcommittee as their proposed routes for the supplemental EIS in a revised project application that modifies the Applicants' original proposal. These updated proposed routes, a double-circuit design feature (see below), and additional mitigation measures are major components of the new information now available for public scoping.

The Applicants' proposed route for each of the two segments has been modified from the 2013 BLM Preferred Route west of approximate midway points, identified as "nodes" in reports submitted by the RAC. Maps that

accompanied the revised project application are available on the BLM project Web site, listed above. For Segment 8, the Applicants' new proposed route still begins at the existing Midpoint Substation and continues west past the communities of Hammett and Mountain Home to the north. However, just north of the town of Orchard, the new proposed route for Segment 8 diverges from the 2013 BLM Preferred Route to generally parallel the existing Summer Lake 500-kV transmission line 250 feet to the south for 5.1 miles before turning northwest, and then crosses the existing line at milepost 7.1.

The new proposed route for Segment 8 enters the NCA at milepost 99. The Applicants have determined that the separation distance between the existing and proposed transmission lines within the NCA could be reduced to approximately 250 feet for a 28.7-mile portion of Segment 8. From milepost 7.1, the new proposed route generally parallels the existing line 250 feet to the north for the remaining distance (30 miles) into the Hemingway Substation, near the town of Melba. The total route length would be 38 miles, of which 22.9 miles would be within the NCA. This route would also require a partial rebuild of approximately 3,000 feet of the existing Summer Lake line. The Applicants propose to use existing roads near and beneath the existing 500-kV transmission line to reduce the overall disturbance footprint of the new line. Rather than constructing a new access road network for the new proposed route for Segment 8, they would use short spur roads from existing roads to access the new towers.

For Segment 9, the Applicants' updated proposed route still starts at the proposed Cedar Hill Substation and passes south of the communities of Twin Falls, Castleford, and Hammett, before diverging from the 2013 BLM Preferred Route just east of the town of Bruneau, and then entering the NCA at milepost 132, north of the towns of Grand View, Oreana, and Murphy before terminating at the Hemingway Substation, near the town of Melba. The Applicants' new proposed route generally follows the Alternative 9G route studied in detail in the 2013 Final EIS. The total route length would be 68.5 miles, of which 53.8 miles would be within the NCA. The updated proposed route for Segment 9 would involve constructing approximately 25.6 miles of new double-circuit 500/138-kV transmission line using steel pole H-frame structures.

The NCA lies in the western portion of the Gateway West project area. The NCA was established under Public Law 103–64, which states: "The purposes for which the conservation area is established, and shall be managed, are to provide for the conservation, protection, and enhancement of raptor populations and habitats and the natural and environmental resources and values associated therewith, and of the scientific, cultural, and educational resources and values of the public lands in the conservation area."

Following publication of the Notice of Availability for the Gateway West Final EIS on April 26, 2013 (78 FR 24771), the Applicants submitted a draft Mitigation and Enhancement Portfolio (MEP) to the BLM. The MEP contains proposed mitigation, including compensatory mitigation, and other measures intended to enhance resources and values found in the NCA. The Applicants presented the draft MEP to the RAC subcommittee and updated it in response to the subcommittee's final report; the MEP has not yet been formally reviewed by the public. The most current MEP is considered part of the proponent's newly submitted plan of development for analysis in the supplemental EIS and is now being made available during the scoping process as new information for the supplemental EIS. The MEP will be described in detail at the public scoping meetings and is available on the project Web site at *http://www.blm.gov/id/st/en/prog/nepa_register/gateway-west.html*.

The BLM is the lead Federal agency for the NEPA analysis process and preparation of the supplemental EIS. The State of Idaho, local government entities, and Federal agencies with specialized expertise and/or jurisdictional responsibilities in the area of Segments 8 and 9 will be invited to participate as cooperating agencies.

The purpose of public scoping is to determine relevant issues that will influence the scope of the environmental analysis. The BLM will invite and provide for full public participation and comment on issues, potential impacts, mitigation measures, and alternatives associated with granting ROWs on public lands for segments 8 and 9 that were not addressed in the original EIS. At present, the BLM has identified the following issues and concerns:

- Effects to the objects and values for which the NCA was designated;
- Land use conflicts and inconsistency with land use plans;
- Effects of the project on local and regional socioeconomic conditions;
- Effects on wildlife habitat, plants, and animals, including threatened, endangered, and sensitive species;
- Effects to visual resources and existing viewsheds;
- Effects to historic and cultural resources;
- Effects to Indian trust assets;
- Opportunities to apply mitigation strategies for on-site, regional, and compensatory mitigation; and
- Siting on private lands versus public lands.

If authorized, this proposal may require amendment of one or more BLM land use plans (resource management plans (RMPs) or management framework plans (MFPs)). By this notice, the BLM is complying with requirements outlined in 43 CFR 1610.2(c) that the BLM notify the public of potential amendments to land use plans. If an RMP or MFP amendment is necessary, the BLM will integrate the land use planning process with the NEPA analysis process for this project.

If the ROWs are granted, BLM land use plans that may be amended include the Twin Falls MFP, the Jarbidge RMP, the Morley Nelson Snake River Birds of Prey RMP, the Bennett Hills/Timmerman Hills MFP and the Kuna MFP.

The BLM will supplement the analysis found in the Gateway West Transmission Line Project final environmental impact statement (FEIS) released April 26, 2013, by analyzing the Applicants' updated proposed routes for Segments 8 and 9 and no action alternatives, as well as other possible alternatives to the proposed power line locations and access routes, based on information gathered from the public during scoping. The BLM will use the NEPA process to identify and disclose impacts to the above resources not analyzed in the FEIS and any additional issues or resources found through the scoping process. Further, the BLM will identify opportunities to mitigate the impacts of siting and building Segments 8 and 9, if granted, by incorporating avoidance, minimization, and compensation measures with consideration of local and regional conditions and commensurate with the scope of the impacts. In addition, opportunities for enhancement of objects and values within the NCA will be evaluated, in accordance with Public Law 103–64, the statute which established the NCA.

Preliminary planning criteria for any RMP or MFP amendments include: (1) FLPMA and subsequent BLM land use plans; (2) Public Law 103–64, which established the Snake River Birds of Prey National Conservation Area (officially named the Morley Nelson Snake River Birds of Prey National Conservation Area in Public Law 111–

11, the Omnibus Public Lands Management Act of 2009); (3) The Endangered Species Act, as amended and (4) the analysis found in the FEIS.

The BLM encourages comments concerning the Applicants' new proposed routes for Segments 8 and 9, the routes previously analyzed in the FEIS, feasible alternative locations, possible mitigation and enhancement measures, and any other information relevant to the proposed action. You may submit comments in writing to the BLM at any public scoping meeting or at any time by using one of the methods listed in the **ADDRESSES** section of this notice. Public scoping meetings will be conducted in an "open house" format with the BLM staff and project Applicants available to explain project details and gather information from interested individuals or groups. You should submit comments by the close of the 30-day scoping period or 15 days after the last public meeting, whichever is later.

The BLM will reach out to the consulting parties who participated in and/or signed the Programmatic Agreement (PA) for Segments 1–7, and 10 to assist the agency in satisfying the public involvement requirements under Section 106 of the National Historic Preservation Act (NHPA) (16 U.S.C. 470(f)) pursuant to 36 CFR 800.2(d)(3). The information about historic and cultural resources within the area potentially affected by the proposed action will assist the BLM in identifying and evaluating impacts to such resources in the context of both NEPA and Section 106 of the NHPA. The information received will be used to modify the PA to clearly capture the issues and mitigation for Segments 8 and 9.

The BLM will consult with Indian tribes on a government-to-government basis in accordance with Executive Order 13175 and other policies. Tribal concerns, including impacts on Indian trust assets and potential impacts to cultural resources, will be given due consideration. Federal, State, and local agencies, along with tribes and other stakeholders that may be interested in or affected by the proposed action that the BLM is evaluating, are invited to participate in the scoping process and, if eligible, may request or be requested by the BLM to participate in the development of the environmental analysis as a cooperating agency.

All comment submittals must include the commenter's name and street address. Before including your address, phone number, email address, or other personal identifying information in your comment, you should be aware that your entire comment—including your personal identifying information—may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so. The minutes and list of attendees for each scoping meeting will be available to the public and open for 30 days after the meeting to any participant who wishes to clarify the views he or she expressed.

Any persons wishing to be added to a mailing list of interested parties can call or write to BLM, as described in this notice. Additional information meetings may be conducted throughout the process to keep the public informed of the progress of the supplemental EIS.

Authority: 40 CFR 1501.7 and 43 CFR 1610.2.

Timothy M. Murphy,

BLM Idaho State Director.

[FR Doc. 2014–22408 Filed 9–18–14; 8:45 am]

BILLING CODE 4310–GG–P

DEPARTMENT OF THE INTERIOR

Bureau of Land Management

[LLCOS00000 L12200000.DF0000 14X]

Notice of Public Meetings, Southwest Colorado Resource Advisory Council

AGENCY: Bureau of Land Management, Interior.

ACTION: Notice of public meeting.

SUMMARY: In accordance with the Federal Land Policy and Management Act and the Federal Advisory Committee Act of 1972, the U.S. Department of the Interior, Bureau of Land Management (BLM) Southwest Colorado Resource Advisory Council (RAC) is scheduled to meet as indicated below.

DATES: The Southwest Colorado RAC meeting will be held on November 7, 2014, in Montrose, Colorado.

ADDRESSES: The Southwest Colorado RAC meetings will be held November 7, 2014, at the Montrose Public Lands Center, 2465 S. Townsend Ave., Montrose, CO 81401. The meetings will begin at 9 a.m. and adjourn at approximately 4 p.m. A public comment period regarding matters on the agenda will be held at 11:30 a.m.

FOR FURTHER INFORMATION CONTACT: Lori Armstrong, BLM Southwest District Manager, 970–240–5300; or Shannon Borders, Public Affairs Specialist, 970–240–5300; 2505 S. Townsend Ave., Montrose, CO 81401. Persons who use a telecommunications device for the deaf (TDD) may call the Federal Information Relay Service (FIRS) at 1–800–877–8339 to contact the above individual during normal business hours. The FIRS is available 24 hours a day, seven days a week, to leave a message or question with the above individual. You will receive a reply during normal business hours.

SUPPLEMENTARY INFORMATION: The Southwest Colorado RAC advises the Secretary of the Interior, through the BLM, on a variety of public land issues in Colorado. Topics of discussion for all Southwest Colorado RAC meetings may include field manager and working group reports, recreation, fire management, land use planning, invasive species management, energy and minerals management, travel management, wilderness, land exchange proposals, cultural resource management and other issues as appropriate.

These meetings are open to the public. The public may present written comments to the RACs. Each formal RAC meeting will also have time, as identified above, allocated for hearing public comments. Depending on the number of people wishing to comment and time available, the time for individual oral comments may be limited.

Ruth Welch,

BLM Colorado State Director.

[FR Doc. 2014–22356 Filed 9–18–14; 8:45 am]

BILLING CODE 4310–JB–P

DEPARTMENT OF THE INTERIOR

Bureau of Ocean Energy Management

[MMAA 104000]

Outer Continental Shelf (OCS), Gulf of Mexico (GOM), Oil and Gas Lease Sales, Central Planning Area (CPA) Lease Sales 235, 241, and 247

AGENCY: Bureau of Ocean Energy Management (BOEM), Interior.

ACTION: Notice of Availability (NOA) of the Final Supplemental Environmental Impact Statement (EIS).

Authority: This NOA is published pursuant to the regulations (40 CFR part 1503) implementing the provisions of the National Environmental Policy Act (NEPA) of 1969, as amended (42 U.S.C. 4321 *et seq.*).

SUMMARY: BOEM has prepared a Final Supplemental EIS for proposed OCS oil and gas Lease Sales 235, 241, and 247, which are tentatively scheduled to be held in March 2015, 2016, and 2017, respectively, in the Gulf of Mexico CPA offshore the States of Louisiana,

Appendix C-2
News Releases

Gateway West Transmission Line Project
950 W. Bannock Street, Suite 800
Boise, ID 83702

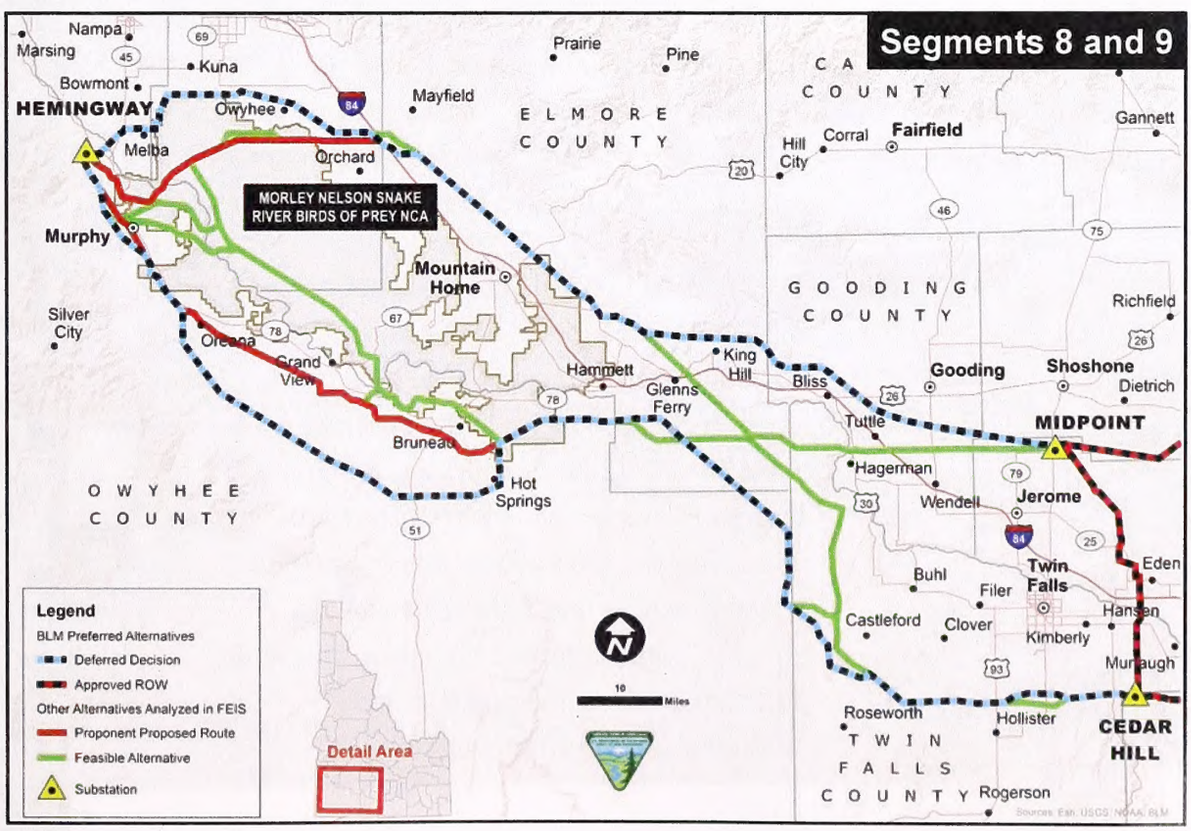
RETURN SERVICE REQUESTED

Gateway West project update on Segments 8 and 9 in Idaho

For more information

- Go online to www.wy.blm.gov/nepa/cfodocs/gateway_west.
- Boise District RAC Website: www.blm.gov/id/st/en/prog/nepa_register/gateway-west.html.
- Email Gateway_West_WYMail@blm.gov.
- Call 1-800-380-5828.
- Write to the Bureau of Land Management.
  Gateway West Project
  P.O. Box 20879
  Cheyenne, WY 82003

Gateway West Transmission Line Project



Segments 8 and 9 in Idaho as shown in the project Record of Decision (ROD). The BLM continues to evaluate routes in this area.

See inside for more information.

Project Update – Segments 8 and 9 in Idaho

The Bureau of Land Management (BLM) released the Record of Decision (ROD) for the Gateway West Transmission Line Project on November 14, 2013. The ROD, prepared under the National Environmental Policy Act (NEPA), identifies the BLM's decision on routing for the project. The Gateway West Transmission Line Project, jointly proposed by Rocky Mountain Power and Idaho Power, is composed of 10 transmission line segments, originating at the Windstar Substation near Glenrock, Wyoming, and terminating at the Hemingway Substation 20 miles southwest of Boise, Idaho.

The ROD, based on the analysis presented in the final environmental impact statement (EIS), identifies the BLM authorized route on public lands for segments 1 through 7 and segment 10. The BLM deferred a decision in the ROD on the authorized routes for segments 8 and 9 in Idaho. The approved segments 1 through 7 and segment 10 are not dependent on segments 8 and 9. The BLM has asked the Boise District Resource Advisory Council (RAC) to evaluate possible routes and provide BLM options to consider prior to beginning any additional environmental review of segments 8 and 9.

What is a Resource Advisory Committee (RAC)?

RACs provide advice to the BLM on the management of public lands and resources. The Boise District RAC is a citizen-based group consisting of 15 members from interests in local communities, including ranchers, environmental groups, tribes, State and local government officials, academics, and other public land users.

Next steps for the BLM

Beginning in December 2013, a subcommittee of the Boise District RAC has been evaluating siting issues associated with segments 8 and 9 in and around the Morley Nelson Snake River Birds of Prey National Conservation Area, as well as on private lands. The subcommittee will prepare a report for the Boise District RAC, which will then present routing options for segments 8 and 9 for the BLM to consider. The subcommittee meetings will continue as needed and are open to the public. Meeting information will be posted on the Boise District RAC website, or you may contact the project team to receive meeting date information.

The BLM Authorized Officer for segments 8 and 9 will review the findings of the Boise District RAC. If additional routing options are to be considered that would require changes to the alternatives presented in the final EIS, the BLM will prepare additional environmental analysis for public review and comment. If additional environmental analysis occurs, the BLM will invite the public to participate and comment on issues, potential impacts, mitigation measures, and alternatives to segments 8 and 9.

BLM

BLM begins scoping for segments 8 and 9 in southwestern Idaho

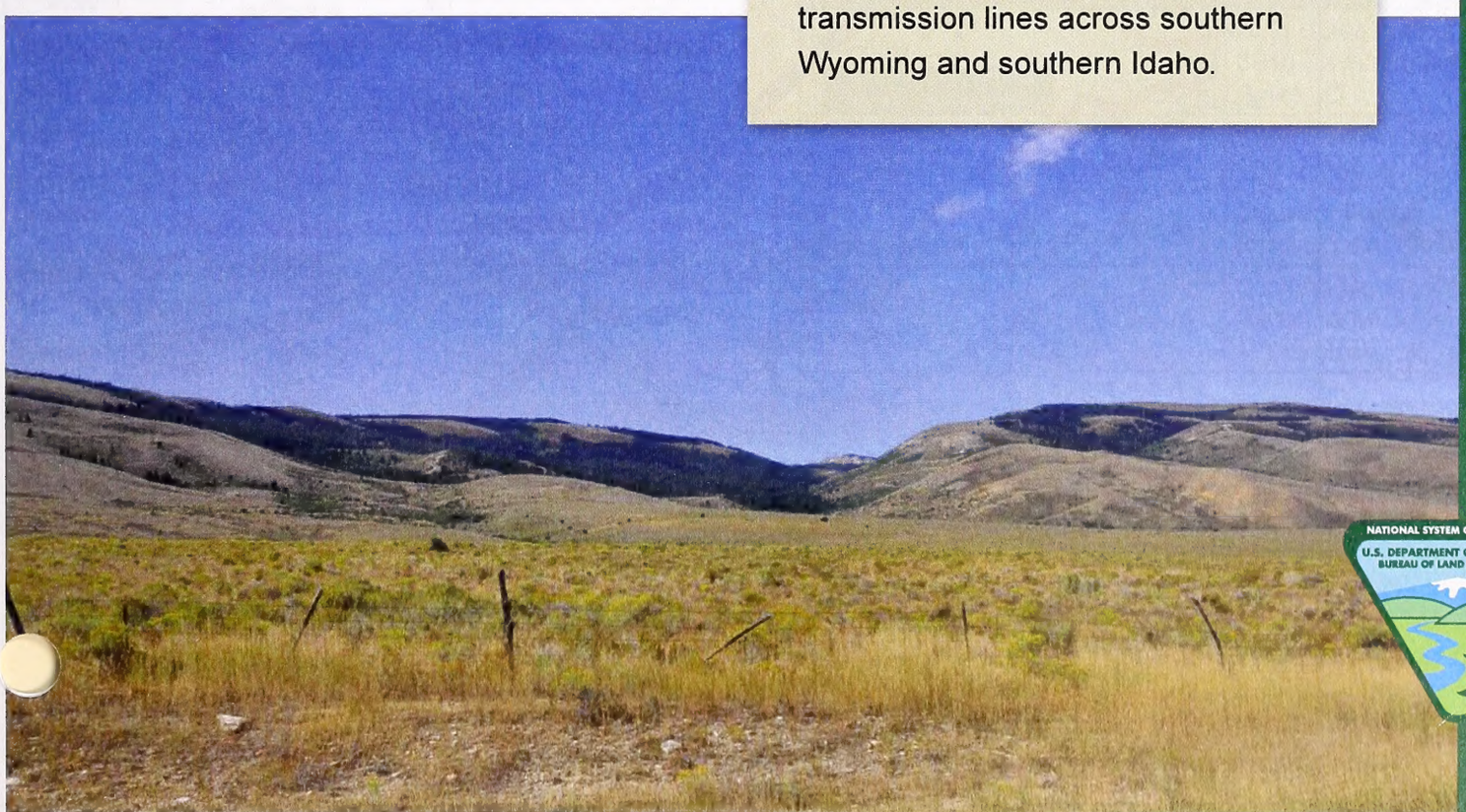
The Bureau of Land Management (BLM) will conduct additional environmental review of segments 8 and 9 of the Gateway West Transmission Line Project in southwestern Idaho. The BLM released a Record of Decision (ROD) for other segments of the project in Wyoming and eastern Idaho (1 through 7 and 10) in November 2013, but deferred a decision on segments 8 and 9 to allow for further discussion of routing alternatives for these segments and additional coordination focusing on conservation and enhancement of resources in the Morley Nelson Snake River Birds of Prey National Conservation Area (NCA).

Discussions led by the BLM Boise District Resource Advisory Council (RAC) resulted in new route options for segments 8 and 9 and proposed mitigation and enhancement measures for resources in the NCA. This is substantial new information that has not been previously analyzed, and the BLM has determined that a supplemental EIS analyzing this new information is needed to support a decision on authorizing these two segments.

See inside for more information about public scoping meetings, the supplemental EIS, and next steps.

About the project

The Gateway West Transmission Line Project is jointly proposed by Rocky Mountain Power and Idaho Power to build, operate, and maintain approximately 1,000 miles of new 230 kilovolt (kV) and 500 kV electric transmission lines across southern Wyoming and southern Idaho.



NATIONAL SYSTEM OF PUBLIC LANDS
U.S. DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

Segments 8 and 9 update

On August 8, 2014, the proponents submitted a revised application for segments 8 and 9, which incorporates some routing options evaluated by the RAC. The proponents also formally submitted the Proposed MEP as part of the updated plan of development for segments 8 and 9.

NEPA process for segments 8 and 9

EISs are prepared under the National Environmental Policy Act (NEPA) to identify and disclose the environmental impacts from federal actions that may significantly affect the human and natural environment. An EIS offers citizens the opportunity to learn about and be involved in the federal decision-making process for projects like Gateway West. A supplemental EIS builds on information and analysis presented in an earlier final EIS.

The NEPA process is complete for segments 1 – 7 and 10 in Wyoming and eastern Idaho, and a decision has been issued for these segments.

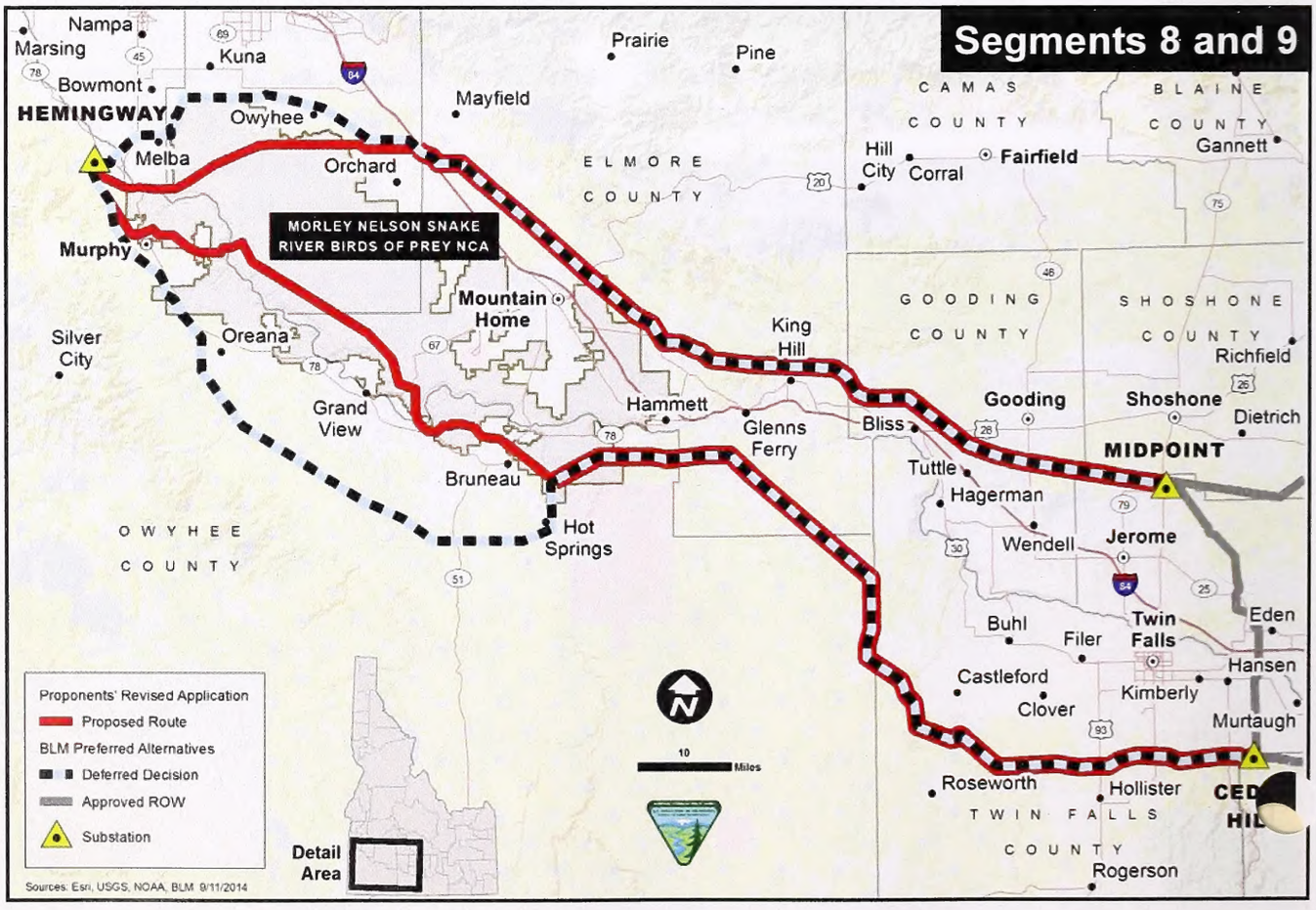
Scoping for segments 8 and 9

The supplemental EIS for segments 8 and 9 will begin with scoping to gather public input on issues to be analyzed in the supplemental EIS. The supplemental EIS will consider information that was not available when the final EIS was developed and additional, relevant information gathered during scoping. Information on segments 8 and 9 from the final EIS, including route analysis, will be carried forward into the supplemental EIS. Authorizing routes for segments 8 and 9 on public lands may require amendments to one or more BLM land use plans.

Some of the new information already available involves:

- Changes in the regulations on the required distance separating parallel transmission lines: the Western Electric Coordinating Council now allows closer distances (a minimum of 250 feet).
- Revisions to the proponents' proposed routes for segments 8 and 9, including double-circuiting of power lines in some areas and adjusted proposed alignments based on information developed by the RAC.
- Proponents formally submitting the MEP, which includes measures proposed to meet statutory requirements for enhancing resources in the NCA.

New proposed routes and final EIS BLM preferred routes for segments 8 and 9 in southwestern Idaho. The BLM will evaluate routes in this area in a supplemental EIS.



The BLM published a Notice of Intent (NOI), which initiated the scoping period for the supplemental EIS. During scoping, the BLM invites comments on issues, potential impacts, mitigation measures, and alternatives associated with granting rights-of-way on public lands for segments 8 and 9 that were not addressed in the final EIS.

At present, the BLM has identified the following issues and concerns, which will be addressed in the supplemental EIS:

- Effects to the objects and values for which the NCA was designated
- Land use conflicts and inconsistency with existing land use plans
- Effects of the project on local and regional socioeconomic conditions
- Effects on wildlife habitat, plants and animals, including threatened, endangered and sensitive species
- Effects to visual resources and existing viewsheds
- Effects to historic and cultural resources
- Effects to Indian trust assets
- Effects to State and private lands, and local government interests

How to provide scoping comments

The BLM encourages comments on the proponents' new proposed routes for segments 8 and 9, routes previously analyzed in the final EIS, feasible alternative locations, possible mitigation and enhancement measures, and any other information relevant to the proposed action. You may submit comments in writing to the BLM at any public scoping meeting or using one of these methods:

Submit comments online at http://www.blm.gov/id/st/en/prog/nepa_register/gateway-west.htm

Email blm_id_gateway_west@blm.gov

Send written comments to:
Bureau of Land Management, Gateway West Project
1387 S. Vinnell Way, Boise, ID 83709

Attend a public scoping open house (see calendar)

Scoping comments should be submitted or postmarked by October 24, 2014.

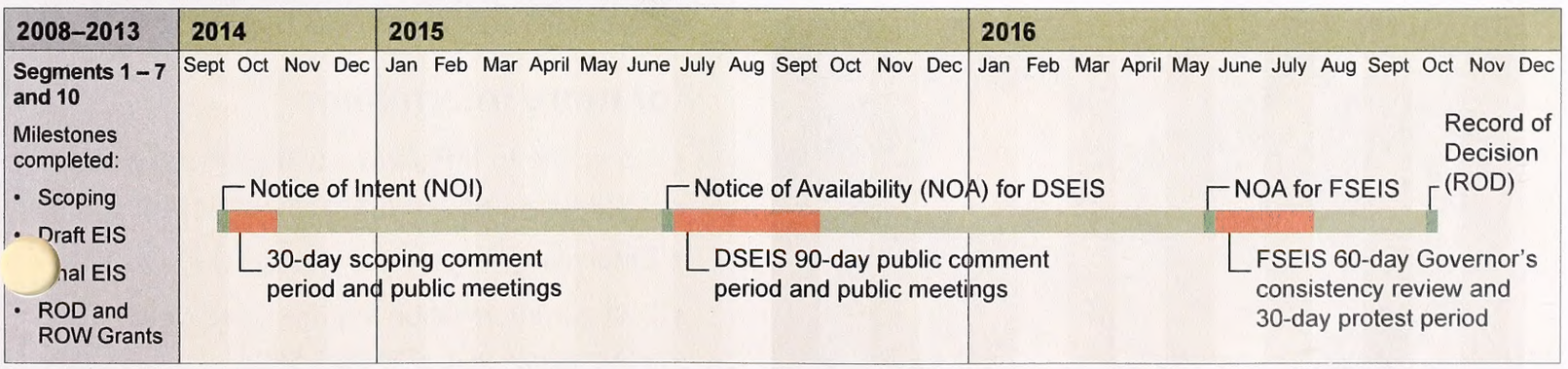
BLM Idaho State Office will lead the supplemental EIS process for segments 8 and 9. All comments and questions related to segments 1 through 7 and segment 10 should be directed to the BLM Wyoming State Office at Gateway_West_WYMail@blm.gov or Bureau of Land Management, Gateway West Project, P.O. Box 20879, Cheyenne, WY 82003.

Calendar of public open houses

The BLM will host a series of public open houses in the areas of segments 8 and 9 to take public scoping comments and provide information on the project and the next steps. You may stop by an open house anytime during the times listed to the right. There will be no formal presentation during the open houses.

Meeting Date	Time	Location
Tuesday, October 7	10 a.m. – 1 p.m.	BLM Boise District Office 3948 Development Ave., Boise, ID
Tuesday, October 7	4 p.m. – 7 p.m.	Kuna Senior Center 229 N. Ave. B, Kuna, ID
Wednesday, October 8	4 p.m. – 7 p.m.	Gooding Fairgrounds 201 Lucy Ln., Gooding, ID
Thursday, October 9	4 p.m. – 7 p.m.	Owyhee County Historical Museum 17085 Basey St., Murphy, ID

Schedule



Gateway West Transmission Line Project
950 W. Bannock Street, Suite 800
Boise, ID 83702

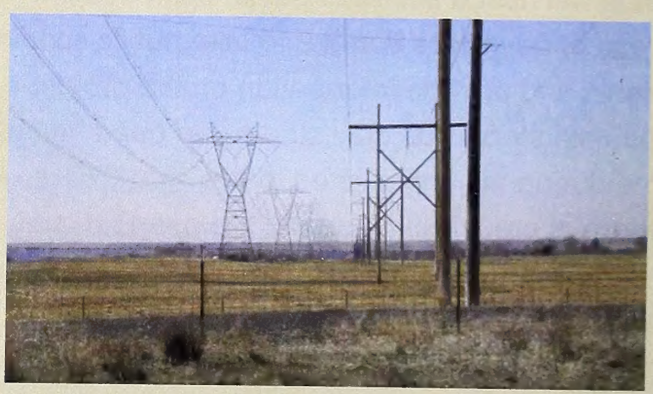
RETURN SERVICE REQUESTED

BLM begins scoping for supplemental EIS for segments 8 and 9 in western Idaho

Gateway West Transmission Line Project

The Bureau of Land Management (BLM) has begun scoping for segments 8 and 9 for a supplemental environmental impact statement. Look inside for information about:

- Project update
- Scoping public meetings and comment period
- Project status and next steps in the NEPA process



For more information

- Go online to http://www.blm.gov/id/st/en/prog/nepa_register/gateway-west.htm.
- Email blm_id_gateway_west@blm.gov.
- Call our information line for up-to-date information at 1-800-380-5828.

Appendix C-3
Scoping Meeting Handout

Gateway West Transmission Line Project
Supplemental Environmental Impact Statement

BLM

October 2014

Why Are We Here?

Rocky Mountain Power and Idaho Power have proposed building and operating approximately 1,000 miles of new high-voltage transmission lines across Wyoming and Idaho. Because portions of these lines would cross public land managed by the BLM and other agencies, the companies submitted an application for a right-of-way (ROW) grant across Federal lands in May of 2007. The BLM granted ROWs for segments 1 through 7 and 10 in 2013 but deferred a decision on segments 8 and 9 to allow additional time for Federal, State and local agencies to work together on identifying routes for these segments and on mitigation and enhancement measures for resources in the Morley Nelson Snake River Birds of Prey National Conservation Area (NCA).

The companies have revised their application and identified a new proposed route for both segment 8 and segment 9. They have also proposed a package of mitigation and enhancement measures for impacts to resources and values in the NCA, in the event that any portions of segments 8 or 9 are sited there. The revised application and the proposed Mitigation and Enhancement portfolio (MEP) represent substantial new information that has not been analyzed under the National Environmental Policy Act (NEPA).

The BLM has determined that a supplemental EIS is needed to analyze this new information for segments 8 and 9 and to reach a decision whether to authorize and site segments 8 and 9 on Federal lands. No additional analysis is needed for segments 1 through 7 and 10.

PROJECT MILESTONES

2007

Initial ROW application

2008

May – July
Scoping for original 10-segment project

2011

July
Draft EIS published

2013

April
Final EIS published

November
Decision for segments 1-7 and 10

December
Boise RAC subcommittee convened

2014

May 30
RAC reports

August 8
Companies submit revised ROW application and Plan of Development

September 19 – October 24
Scoping for supplemental EIS for segments 8 and 9

2015 (estimated)

June
Publish Draft Supplemental EIS for segments 8 and 9

September
Public comment on Draft Supplemental EIS closes

2016 (estimated)

May
Publish Final Supplemental EIS for segments 8 and 9

June
Protest period closes

October
Record of Decision for segments 8 and 9

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While the revised application and the MEP focus on the area in and near the NCA, the BLM has not made a decision on any portion of segment 8 or 9. The BLM is asking you to review and comment on the revised proposed routes, along with route alternatives considered by the Boise District Resource Advisory Council (RAC), and all routes considered in the original EIS. Additional route options may be identified through the scoping process. Information about all previously proposed routes for segments 8 and 9 is available at today's meeting and online at **http://www.blm.gov/id/st/en/prog/nepa_register/gateway-west.html**. The BLM will use information gathered during scoping to determine which routes to analyze in the supplemental EIS. The supplemental EIS will inform the BLM Idaho State Director's decision on whether or not to grant a right-of-way across Federal land, and, if a right-of-way is granted, what routes would be authorized and what enhancement and additional mitigation measures would be required for any portion of an authorized route that crosses the NCA.

Scoping began on September 19, 2014, and will close on October 24, 2014. Your comments will be most helpful if they are submitted during this period. There is a station at today's meeting where you can submit comments. You may also mail or email your comment to the one of the addresses listed at right, or submit your comments on the project Web site listed above.

How Best To Comment

The most helpful comments will:

- Provide new information pertaining to segments 8 and 9, including the proposed MEP;
- Identify new issues that should be considered;
- Identify a different way to meet the underlying need;
- Point out a specific flaw in the companies' proposal, in the information developed by the RAC, or in past NEPA analysis;
- Suggest methodologies that should be used in the NEPA analysis, including reasons why; and/or
- Identify a different source of credible research that should be used in the NEPA analysis.

Project information line: toll-free | 1-800-380-5828

eMail: blm_id_gateway_west@blm.gov

Mail, Courier or Hand Delivery:

Bureau of Land Management
Idaho State Office
Gateway West Transmission Project
1387 S. Vinnell Way
Boise, ID, 83709

Privacy Note: Comments, including names and addresses of respondents, will be made available to the public after the close of the official comment period. Please be advised that your entire comment, including your personal identifying information, may be made publicly available at any time. Although you may ask the BLM in your comment to withhold your personal identifying information from the public, we cannot guarantee that we will be able to do so. All submissions from organizations and businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses, will be available for public inspection in their entirety.

Appendix J

Appendix J

BLM Manual 6280
Inventory and Impacts Analysis for National Historic Trails and Study Trails

BLM Manual 6280
Inventory and Impacts Analysis for National Historic Trails and Study Trails

Gateway West Transmission Line Project
Supplemental Environmental Impact Statement

Prepared by AECOM

Submitted To:

Bureau of Land Management

February 2016

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1 INTRODUCTION

On May 7, 2007, Idaho Power Company and PacifiCorp (doing business as Rocky Mountain Power), collectively known as the Proponents, applied to the Bureau of Land Management (BLM) for a right-of-way (ROW) grant to use the National System of Public Lands for portions of the Gateway West Transmission Line Project (Gateway West or Project) that extends from the Aeolus Substation in Wyoming to the Hemingway Substation, approximately 30 miles southwest of Boise, Idaho. The Project comprises 10 transmission line segments with a total length of approximately 1,000 miles.

The BLM published the Final Environmental Impact Statement (FEIS) for this Project on April 26, 2013 (BLM 2013a), and a Record of Decision (ROD) on November 14, 2013 (BLM 2013b). In the ROD, the BLM deferred offering a ROW grant for 2 of the 10 segments (i.e., Segments 8 and 9) to allow additional time for federal, state, and local permitting agencies to examine additional routing options, as well as mitigation and enhancement measures for these segments.

The Proponents submitted a revised Project application for Segments 8 and 9 in August 2014. The BLM is now preparing a Supplemental Environmental Impact Statement (SEIS) to analyze seven action alternatives: Revised Proposed Routes for Segments 8 and 9 (Proposed Action), Revised Proposed 8 and FEIS Proposed 9 (BLM Co-Preferred Alternative), Revised Proposed 8 and 9K Route, the 8G Route and FEIS Proposed 9, the 8G and 9K Routes (BLM Co-Preferred Alternative), the 8H Route and FEIS Proposed 9, and the 8H and 9K Routes. The BLM is also analyzing the two Toana Road Variations to the Revised Proposed Route for Segment 9. While incorporating by reference the analysis included in the Gateway West 2013 FEIS, the SEIS will supplement the analysis found in the FEIS by assessing the new information that has become available since the FEIS and ROD were published.

In addition to analyzing new information, the BLM is now also required to prepare this *BLM Manual 6280 Inventory and Impacts Analysis for National Historic Trails and Study Trails*. The Project crosses private and public lands with segments of the Oregon National Historic Trail (Oregon NHT), the North Alternate Oregon Trail Study Trail (North Alternate Study Trail), Goodale's Cutoff Study Trail, and North Side Alternative Route Study Trail. In compliance with the National Trails System Act (NTSA) of 1968 (Public Law [P.L.] 90-543, as amended through P.L. 111-11) and with the guidelines in BLM Manual 6280, *Management of National Scenic and Historic Trails Under Study or Recommended as Suitable for Congressional Designation* (Manual 6280) (BLM 2012), it is necessary to inventory cultural, historic, visual, and recreation resources and characteristics for sites and trail segments associated with the portions of these trails on BLM-managed lands that occur within the Gateway West Project analysis area. While the Oregon NHT and North Alternate Study Trail are situated on BLM-managed lands affected by the Project, Goodale's Cutoff Study Trail and North Side Alternative Route Study Trail are not located on BLM-managed land in the Project Analysis Units (AU) or Area of Potential Adverse Impact (APAI). No additional analysis for the Goodale's Cutoff Study Trail and North Side Alternative Route Study Trail, therefore, is contained in this report. For a discussion of historic trails and roads not subject to BLM Manual 6280, such as Goodale's Cutoff Study Trail and North Side Alternative Route Study Trail

as well as sites of historic or cultural significance, please refer to Section 3.3 – Cultural Resources in the SEIS.

The NTSA of 1968, as amended, established a network of visual, historic, and recreational trails to provide for outdoor recreation needs; promote the enjoyment, appreciation, and preservation of open-air, outdoor areas, and historic resources; and encourage public access and citizen involvement. BLM Manual 6280 establishes the agency's policies for managing these National Trails and trails under study for National Trail designation, and it provides direction for identifying and evaluating impacts on "the nature and purposes of the trail, trail resources, qualities, values, uses (including public access and enjoyment) and associated settings" from proposed actions subject to analysis under the National Environmental Policy Act (NEPA) (BLM 2012:1–18). This Inventory and Impacts Analysis report follows BLM Manual 6280 policy guidance to identify those natural, cultural, recreational, and visual resources, qualities, values, associated setting, and primary uses that support the nature and purposes of National Historic Trails (NHTs) and trails undergoing a National Trail Feasibility Study. The Gateway West Project SEIS identifies the consequences that the Revised Proposed Routes for Segments 8 and 9 and alternatives/variations would have on those resources. There are no National Scenic Trails, Recreation (including Water) Trails, or Connecting and Side Trails in the inventory area, and as such, this inventory focuses solely on segments of the Oregon NHT and North Alternate Study Trail, as they are situated on BLM-administered lands.

2 REGULATORY FRAMEWORK

2.1 National Trails System Act

According to the NTSA of 1968, the Secretary charged with administration of the NHT may permit other uses along the trail provided that they do not "substantially interfere with the nature and purpose of the trail" (16 United States Code [U.S.C.] 1246). In this regard, "reasonable efforts shall be made to provide sufficient access opportunities to such trails and, to the extent practicable, efforts shall be made to avoid activities incompatible with the purposes for which such trails were established" (16 U.S.C. 1246). Easements or rights-of-way granted by the Secretary of the Interior or Secretary of Agriculture must comply with laws applicable to the national park system and national forest system, and conditions established in the easements or rights-of-way must reflect the policy and purposes of the NTSA (16 U.S.C. 1248).

The proposed Gateway West Project, the alternatives, and their associated features may directly or indirectly impact segments of the Oregon NHT, NHT-related resources, and the North Alternate Study Trail present within the inventory area (see Section 6 for impacts analysis). NHTs, which are authorized and designated only by an act of Congress, commemorate historically significant routes (i.e., historic routes of exploration, migration, trade, communication, and military action) whose location is known sufficiently to permit public recreation and historical interest (NPS 2013). To be designated by Congress, NHTs must follow as closely as possible the actual route of historic use, be of national significance, and have significant potential for public recreation and/or interpretation opportunities (16 U.S.C. 1242).

2.2 National Historic Preservation Act

Section 106 of the National Historic Preservation Act (NHPA; 54 U.S.C. 300101 et seq.) requires that the federal agency permitting the undertaking "take into account the effect of the undertaking on any district, site, building, structure, or object that is included in or eligible for inclusion in the National Register" and provide the Advisory Council on Historic Preservation (ACHP) an opportunity to comment. Effect is defined in the implementing regulations for Section 106 (36 Code of Federal Regulations [CFR] 800.16(i)) as "alteration to the characteristics of a historic property qualifying it for inclusion in or eligibility for the National Register." Section 106 requires the lead federal agency to consult with the State Historic Preservation Office, members of the public, affected Native American tribes, and the ACHP throughout the process of identification, evaluation, and resolution of effects. Section 106 compliance is considered satisfied with the execution of a programmatic agreement (PA), a legal document that describes the lead federal agency's (in this case, the BLM's) process of identifying and evaluating impacts on historic properties and its plans for resolving adverse effects.

As a historic property listed on the National Register of Historic Places (NRHP), the Oregon NHT requires evaluation of effect under Section 106. Segments and sites associated with the trail located in the direct and indirect area of potential effects established for the Project will be assessed through cultural resources inventory associated with the Section 106 process, and effects will be determined in consultation with tribes and parties to the project PA. This Inventory and Impacts Analysis draws upon the NRHP eligibility assessments of segments through previous documentation; fieldwork performed in conjunction with the inventory and analysis did not reevaluate the NRHP eligibility of previously documented trail segments and sites. BLM Manual 6280 requires the BLM to consider how the proposed action would affect designated NHT properties, including "remnants and artifacts from the associated period of use that may be eligible or listed on the National Register" (BLM 2012). The BLM, therefore, is required to coordinate the analysis of cultural resources associated with the Oregon NHT and North Alternate Study Trail with the Manual 6280 Inventory and Impacts Analysis. While the Manual 6280 Inventory and Impacts Analysis covers Project impacts to segments of the Oregon NHT and North Alternate Study Trail on BLM-managed land, Section 106 requires the BLM to consider a more comprehensive assessment of Project impacts to NRHP-eligible segments of these two trails on both federal and non-federal lands. The Section 106 analysis for these resources is discussed in Section 3.3 – Cultural Resources of the SEIS.

2.3 Federal Land Policy and Management Act

Designated NHTs as well as Trails under study are managed as public lands under the Federal Land Policy and Management Act (FLPMA). This act, also known as the BLM Organic Act, establishes the agency's "multiple-use mandate to serve and protect future generations" (BLM and Office of the Solicitor 2001). The concept of "multiple-use" management is defined within the act (43 U.S.C. 1702) as "management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people." The uses and

values associated with the Oregon NHT and North Alternate Study Trail that fall within the Gateway West analysis area are documented in this inventory.

2.4 National Environmental Policy Act

NEPA (42 U.S.C. 4321) requires the federal government to take a "hard look" and to evaluate and disclose the anticipated environmental consequences that would occur if major federal actions are implemented. This analysis includes an articulation of what action is to be considered (the proposed action), where it will occur (the affected environment), a reasonable range of alternatives for accomplishing the project, and a description of the environmental consequences associated with the project. The purpose of NEPA is to allow the decision maker and the public to have information sufficient to understand the environmental consequences of major federal actions. This information is disclosed in the context of an environmental assessment or environmental impact statement.

This NHT Inventory and Impacts Analysis report responds to these regulatory requirements. This report focuses on the resources within the designated Oregon NHT, in accordance with the NTSA, as well as on resources within trails under study for inclusion as NHTs, in accordance with BLM Manual 6280. As guided by the NHPA, this report allows BLM to "take into account the effect of the undertaking on any district, site, building, structure, or object that is included in or eligible for inclusion in the National Register." FLPMA guides the BLM to manage public lands for multiple use, including protection of resources of historic significance, as well as allowed uses, including establishment of rights-of-way for utilities. NEPA requires identification of resources and evaluation of the environmental consequences associated with the action to approve the ROW requested for construction of the proposed Gateway West Project.

2.5 BLM Manual 6280 (Management of National Scenic and Historic Trails and Trails under Study or Recommended as Suitable for Congressional Designation)

BLM Manual 6280 provides policies for the management of National Scenic and Historic Trails. Specifically, this manual identifies requirements for the management of congressionally designated NHTs; trails undergoing a National Trail Feasibility Study; trails that are recommended as suitable for National Trail designation through the National Trail Feasibility Study; inventory, planning, management, and monitoring of designated National Scenic and Historic Trails; and data and records management requirements for National Scenic and Historic Trails. The manual also provides guidance on the application of NEPA to NHTs and Trails Under Study (BLM 2012).

As part of the NEPA analysis, for any implementation-level action proposed or that may potentially affect NHTs, the BLM is required to do the following:

- For each alternative, describe and analyze the potential impacts to the nature and purposes of the National Trail; the National Trail resources, qualities, values, and associated settings; and the primary use or uses of the trail.

- Describe the impacts to the national significance of National Trails, based on NHPA criteria and other NTSA criteria, as well as impacts to the significance of properties that are eligible or listed on the National Register, as applicable.
- Ensure adequate public involvement in the BLM's management activities through NEPA, land use planning, and/or other applicable processes.
- To the greatest extent possible, consider opportunities for mitigation to a level commensurate with the adverse impact to the nature and purposes; resources, qualities, values, and associated settings; and the primary use or uses of the National Trail.

For trails under feasibility study, the NEPA analysis for the proposed action is required to consider existing data, including data from the completed National Trail Feasibility Study (if available), or additional data collected as necessary for alternative formulation and analysis of the proposed action (i.e., Gateway West Transmission Line Project). In evaluating whether to approve the proposed action, the BLM's NEPA analysis is required to

- Describe the values, characteristics, and settings of trails under study and trails recommended as suitable in the affected environment section of the NEPA document;
- Analyze and describe any impacts of the proposed action on the values, characteristics, and settings of trails under study or trails recommended as suitable; and
- Consider an alternative that would avoid adverse impacts to the values, characteristics, and settings of the trail under study or recommended as suitable and/or incorporate and consider applying design features to avoid adverse impacts.

To analyze the potential for Project impacts, the manual stipulates that the inventory include an interdisciplinary assessment of NHT-related recreation resources, qualities, and values and settings, visual and settings, historic/cultural and settings, and natural and settings (BLM 2012).

3 SCOPE OF ANALYSIS

3.1 Issues Identified for Analysis during Scoping

In order to determine the scope and breadth of this and other studies undertaken for the Project, the BLM has received public and agency comments concerning NHTs affected by the Project. The following NHT-related issues were raised by the public during the initial public scoping period for the Gateway West Transmission Line Project in 2008 (Tetra Tech 2008) and during the SEIS scoping (Tetra Tech 2015). Additional information was collected during a Manual 6280 consultation meeting held by the BLM on March 3, 2015. The meeting was attended by staff of the BLM, National Park Service (NPS), Rocky Mountain Power, Idaho Power, Shoshone-Paiute Tribes, National Trust for Historic Preservation, and Idaho Chapter Oregon-California Trails Association staff. The following issues and concerns raised by federal and state agencies, tribes,

and private organizations during scoping and agency discussions were considered in this report as stipulated by law or regulation:

- What are the impacts to NRHP-eligible historic resources?
- What would be the visual and recreational impacts on historic trails?
- Where the setting is an important aspect of the integrity of a property, would the setting be affected?
- How will the BLM avoid and/or minimize impacts to the Oregon NHT?
- How will the BLM work with the Proponents to locate the Project near areas already visually impaired and away from NHTs?
- How will the BLM actively coordinate with other organizations and agencies on effects to the Oregon NHT?
- How will the BLM protect visitor experiences associated with the Oregon NHT?
- How will the BLM develop any potential mitigation to be commensurate with the Project's impacts?
- How will the BLM address concerns with Project routing near the Hagerman Fossil Beds National Monument, Three Island Crossing State Park, and along Segment 9 between King Hill and the NCA?

The scoping comments received during the 2014-2015 scoping effort were similar to those received in 2009.

3.2 Area of Potential Adverse Impact, Analysis Units, and Affected Trails

To date, no National Trail Management Corridor has been established for the Oregon NHT within Idaho. In lieu of having a designated Management Corridor, the BLM is required to identify the APAI (BLM 2012: 3-1). After considering the scoping comments of agencies and the public, the BLM established the APAI to include all BLM-managed lands within a 10-mile corridor, or 5 miles on either side of the centerline for the Revised Proposed Routes, Alternative Routes, and FEIS routes that would have a view of the proposed Project (see Attachment A1). Five miles is generally the viewing threshold, beyond which point terrain and atmospheric conditions tend to absorb the transmission line. Due to the nature of lattice structures and color of the H-frame structures, these structures would not be visible in this landscape beyond 5 miles. This corridor lies within the BLM-defined Foreground/Middleground Visual Resource Inventory (VRI) distance zone where indirect adverse impacts to NHTs and Study Trails are most likely to occur (BLM 1986a).

In order to analyze the APAI, five inventory AUs were developed. For the purposes of this analysis, an AU is a polygon encompassing discrete segments of the Oregon NHT and North Alternate Study Trail and the associated viewshed where the Manual 6280 inventory is performed. These five AUs were prepared to delineate the geographic area for identifying the resources, qualities, values, associated settings, and primary uses that support the nature and purposes of the Oregon NHT and the North Alternate Study Trail and for assessing the potential for Project impacts. Table 1 provides the

respective lengths of the Oregon NHT and the applicable Study Trails that are located in the APAI.

Table 1. Length of Oregon NHT and Study Trails within the BLM Manual 6280 APAI by County, State, and BLM Field Office

Trail Name and Designation	County, State	BLM Field Office	Total Length of Trail in Field Office (all ownership) (miles)	Length of Trails within BLM Manual 6280 APAI (BLM-managed land only) (miles)
Oregon NHT Designated Route	Owyhee and Elmore Counties, ID	Four Rivers	96.4	95.4
	Twin Falls County, ID	Burley	2.4	0.4
	Owyhee, Elmore and Twin Falls Counties, ID	Jarbidge	48.6	21.9
	Elmore and Gooding Counties, ID	Shoshone	0	0
	Owyhee County ,ID	Owyhee	15.6	3.3
	Owyhee County, ID	Bruneau	14.6	0.5
Subtotal Length Oregon NHT			**177.5**	**121.4**
North Side Alternative Route Study Trail	Gooding and Twin Falls Counties , ID	Shoshone	11.4	0
	Twin Falls County, ID	Jarbidge	0.2	0
North Alternate Oregon Trail Study Trail	Elmore and Gooding Counties, ID	Shoshone	43.1	13.8
	Elmore County, ID	Four Rivers	21.6	17.0
	Twin Falls County, ID	Jarbidge	0.2	0
Goodale's Cutoff Study Trail	Elmore County, ID	Four Rivers	1.8	0
Total Length of Study Trails			**78.1**	**30.8**
Total Length of NHT and Study Trails			**255.6**	**152.7**

For the purposes of preparing the VRI consistent with Handbook 8410-1, the AUs were extended to 15 miles in order to adequately identify the distance zones, scenic quality, and visual sensitivity of the landscapes and settings that surround the Oregon NHT and North Alternate Study Trail. Project impacts to the resources, values, and qualities of the Oregon NHT and North Alternate Study Trail are not expected to be adverse in the area between 5 and 15 miles, and the inventories performed for cultural/historical resources, recreation, and natural resources were not performed in the expanded

portions of the AUs. The methodology for inventory and impacts analysis is discussed in more detail in Sections 4 and 6 of this document.

3.3 Designated National Historic Trails Affected by the Project

Within the APAI, one designated NHT, the Oregon NHT, would be affected by the Project. Congressionally designated in 1978 (P.L. 95-625 amendment to the NTSA, P.L. 90-543), the Oregon NHT formally recognizes the 2,200-mile emigrant trail that connected the Missouri River to the fertile Columbia River and Willamette valleys in Oregon, a route used by approximately 400,000 people during its period of use. Within the Project AUs and APAI, the designated Oregon NHT route splits into two routes at the Three Island Crossing of the Snake River near present day Glenns Ferry, Idaho. These two routes are typically referred to as the "Primary" or "North Trail" and the South Alternate. Each route is considered a part of the designated Oregon NHT during its period of primary use 1841 to 1848 (NPS 1998).

The North Trail (Primary Route) extends along the north side of the Snake River Valley from the Twin Falls-Elmore County line to the outskirts of present-day Boise, Idaho. The South Alternate, meanwhile, traverses the comparably dry lands situated on the south side of Snake River. The two routes eventually converge to one route again near Boise, Idaho.

3.4 Trails Recommended as Suitable for National Trail Designation

In addition to trails formally designated by Congress, BLM Manual 6280 requires the BLM to analyze Project impacts to "Trails Recommended as Suitable for National Trail Designation" that have been identified in a feasibility study. Within the APAI, alternative routes of the Oregon NHT followed the north side of the Snake River from a point north of American Falls to a junction just west of Mountain Home. These routes are currently not part of the designated Oregon NHT and are known as the North Alternate Oregon Trail, North Side Alternative Route, and Goodale's Cutoff Study Trails. The three trail routes are part of a feasibility study being conducted by the NPS under the congressionally approved Omnibus Public Land Management Act of 2009 (Public Law 111-11 Section 5302) (NPS 2011a). While portions of these three Study Trails pass through the APAI, only the North Alternate Oregon Trail is part of this study because the North Side Alternative Route and Goodale's Cutoff Study Trails are not on land managed by the BLM and thus are beyond the scope of this report.

4 METHODS

4.1 Inventory Methodology

4.1.1 Introduction

BLM Manual 6280 provides policy guidance that directs the BLM to inventory the resources, qualities, values, associated setting, and primary uses that support the nature and purposes of segments of the Oregon NHT and North Alternate Study Trail and to assess impacts from proposed agency actions. The agency, however, has not developed a formal methodology for either the inventory or impact assessment. In the

absence of agency direction, the following inventory and analysis of impacts was developed for the Project in coordination with the BLM, NPS, and Idaho Chapter Oregon/California Trails Association. Given the lack of a formal methodology, this analysis is considered reasonable and appropriate because it utilizes existing methods for collecting and analyzing data germane to the resources being studied. For the cultural resources component of this study, for instance, the analysis closely follows the identification, evaluation, and impact assessment thresholds common to cultural resource investigations prepared under the requirements of 36 CFR 800. Likewise, the visual resource components of the analysis follow the inventory methods developed by the BLM's VRM program (see SEIS Section 3.2 – Visual Resources; BLM 1986a).

Following the interdisciplinary study requirements of Manual 6280, inventories were prepared for visual, recreation, cultural, and natural resources that characterize the affected environment and setting for the Oregon NHT and North Alternate Study Trail. An interdisciplinary field team collected data from individual Inventory Observation Points (IOPs) on the recreation, natural, visual, and cultural/historic resources, qualities, and values and associated settings of the Oregon NHT and North Alternate Study Trail. The methodology for inventorying and analyzing Project impacts included background research, viewshed application, field assessment of IOPs, visual simulations, and discipline-specific impact analysis at Key Observation Points (KOPs).

4.1.2 Background Research

Background information pertaining to the visual, recreation, cultural, and natural resources, values, and qualities associated with the Oregon NHT and North Alternate Study Trail within the AUs and APAI was collected from a variety of sources to determine the breadth of existing information and to identify potential data gaps that would need to be addressed through a field investigation. Technical documents consulted during the background research effort included the following:

- Scoping Report: Oregon, California, Mormon Pioneer, and Pony Express National Historic Trails Feasibility Study Update and Revision/Environmental Assessment (NPS 2011b);
- Management and Use Plan Update Final Environmental Impact Statement: Oregon National Historic Trail Mormon Pioneer National Historic Trail (NPS 1998);
- Owyhee Resource Management Plan (BLM 1999);
- National Historic Trails Auto Tour Route Interpretive Guide: Along the Snake River Plain through Idaho (NPS 2008);
- Main Oregon Trail Backcountry Byway from Three Island Crossing to Bonneville Point (BLM and IOCTA 2009);
- Idaho Recreation Guide: Campgrounds, Sites and Destinations (BLM n.d.);
- Bruneau Management Framework Plan (BLM 1983b);
- Jarbidge Resource Management Plan and Record of Decision (BLM 1987);
- Jarbidge Resource Management Plan and Record of Decision (BLM 2015);

- Morley Nelson Snake River Birds of Prey National Conservation Area Resource Management Plan and Record of Decision (BLM 2008);
- Pieces to the Puzzle: Rediscovering Idaho's North Alternate Oregon Trail (Eichhorst 2011);
- Trails of the West: A Review and Evaluation of Historic Trails in Wyoming and Idaho Along the Proposed Gateway West Transmission Line Project (Tetra Tech and URS 2011); and
- Gateway West FEIS and ROD (BLM 2013a and 2013b).

Additional sources included emigrant diaries consulted during archival research, cultural resource reports prepared for the Project, and other primary and secondary sources such as manuscripts and books on the history of the Oregon Trail, historic maps such as General Land Office (GLO) plats, modern trail guides, and BLM pamphlets for Oregon NHT interpretive sites.

4.1.3 Viewshed Analysis

Consistent with the requirements of BLM Manual 6280, two separate viewshed analyses were conducted for this Project. The viewsheds were used to:

1. complete a VRI centered on the Oregon NHT and North Alternate Study Trail; and
2. determine whether BLM-managed trail segments or associated sites could have a view of the proposed Project.

Both viewsheds were created using a Geographic Information System (GIS)-based "bare earth" application based upon a digital elevation model that reveals the visible areas of a landscape based on existing landforms without consideration of vegetation and/or the built environment regardless of property ownership. This analysis, therefore, conveys the greatest possible extent of the views from the two respective trails (for the purposes of the VRI) in addition to the greatest possible extent of potential Project visibility (for the APAI). The validity and extent of the viewshed model was confirmed during fieldwork and in the development of the Project simulations (Attachment D).

4.1.4 Analysis Units

Consistent with BLM Manual 6280, inventory AUs were developed around segments of the Oregon NHT. An AU is a polygon encompassing discrete trail segments as well as the resources, qualities, values, associated settings, and primary uses that support the nature and purposes of the Oregon NHT and the North Alternate Study Trail. Five inventory AUs were developed based on the presence of distinct Oregon NHT high potential historic sites (HPHSs) and high potential route segments (HPRSEGs) in addition to the North Alternate Study Trail (See Attachment A2). The development of the AUs also took into consideration the presence of significant landforms or changes in land use that represented obstacles to the visual environment of the respective trails. The built environment and intensive agricultural land use around Grand View, Idaho, for instance, interrupts the visual setting of the Oregon NHT as it heads north and west, thus prompting the split of AU 1 into AU 1a and AU 1b.

Due to the lack of available VRI data for the trails, the AU viewshed was established to a distance of 15 miles from the respective trails to facilitate the VRI centered on the Oregon NHT and North Alternate Study Trail. This distance was consistent with that required under BLM's VRI process to understand the contribution of background views to the characteristics of the foreground/middleground (0-5 miles) area (BLM 1986a). The seldom seen distance zone (beyond 15 miles) was not included because it was not considered to substantially contribute to the trails' setting. The VRI process is described in Section 4.5.1. The inventory areas for recreation, cultural, and natural resource analyses were limited to 5 miles from the trails because Project features, most notably the lattice or H-frame transmission structures, would not be visible in this landscape (see Section 3.2 – Visual Resources).

4.1.5 Inventory Observation Points

IOPs are the basic building blocks of data collection for the BLM Manual 6280 study and provide overviews of the recreational environments, historic setting, and visual landscape of an historic trail. Utilizing background research and the viewshed analyses, IOPs were selected based upon the following characteristics:

- existing trail recreation and interpretive developments;
- critical points that reflect how visitors interact with the trail;
- areas with sensitive resources, qualities, values, and associated settings;
- regularly spaced intervals along the Oregon NHT and North Alternate Study Trail;
- trail-related NRHP-eligible and listed properties;
- significant historic trail-related features such as river crossings, graves, and inscription sites;
- HPHSs;
- HPRSEGs;
- designated auto tour routes (ATRs); and
- trails that facilitate public access and opportunities for vicarious experiences.

IOPs identified for the inventory and analysis are mapped in Attachment A2, with digital photographic overviews of the individual IOPs presented in Attachment B.

4.1.5.1 Visual Resource Inventory Methodology

Consistent with the requirements of BLM Manual 6280, the VRI and visual resource impacts analysis uses the concepts of the BLM's VRM system as outlined in BLM VRM Manual 8400 (BLM 1984).

The VRM system requires the inventory of scenic values and the establishment of management objectives for those values through the VRM planning process. This is typically accomplished through the development of Resource Management Plans. While VRM classes are established within the AUs, the VRI data within the six BLM Field Offices covered by the AUs are currently in various stages of being updated through various RMP updates and could not provide comprehensive coverage of all of the AUs. In order to identify the scenic values within the five AUs, a VRI centered on

the Oregon NHT and North Alternate Study Trail was prepared. Consistent with BLM Manual 6280 guidance, VRI data, including scenic quality, viewer sensitivity, and distance zones, were inventoried by the field team.

Scenic Quality

Scenic quality as defined by the BLM is the measure of the visual appeal of a tract of land. In the VRI process, public land is given an A, B, or C rating, based on the evaluation of the following seven key factors: landform, vegetation, water, color, adjacent scenery, scarcity, and cultural modifications. Class A scenery typically has a higher degree of landscape relief, diversity of water, and vegetation that harmoniously combine and result in a high level of aesthetic appeal. Class B scenery has less variety in the elements that comprise the landscape, but still has some diversity and visual interest. Class C scenery typically does not have much diversity in terms of landscape features, and rates the lowest from an aesthetic perspective. Scenic Quality Rating Units (SQRUs) are units of land that characterize the natural landscape setting. These settings are associated with similar features that harmonize with each other and result in a particular landscape character. These SQRUs may range in size from several thousand acres to 100 acres or less, depending on the homogeneity of the landscape features, and take into account man-made features that either enhance or detract from the scenic value. The use of SQRUs to characterize the existing setting of National Trails will provide a consistent definition of setting for all trail resources (visual, recreation, cultural, and natural).

Viewer Sensitivity

Sensitivity levels are a measure of public concern for the maintenance of scenic quality associated with a given tract of BLM-managed land. Public lands are assigned high, medium, or low sensitivity by analyzing the various indicators of public concern, including type of user, amount of use, public interest, adjacent land uses, and special areas, among other factors. Similar to SQRUs, Sensitivity Level Rating Units characterize the public value of the natural landscape setting and do not always correlate with the most scenic areas. For the purposes of this Project, viewer sensitivity levels within the AUs were assumed to be high due to the general accessibility of the Oregon NHT, the ATRs, and other trail-related recreational opportunities.

Distance Zones

Consistent with Manual 8400, landscapes are subdivided into three distance zones based on relative visibility from public viewing locations (i.e., roads, residences, etc.). The three distance zones that the BLM uses to characterize the visibility of BLM-administered lands are foreground/middleground (0 to 5 miles), background (5-15 miles), and seldom seen (greater than 15 miles).

On the basis of these three inventory factors, all BLM-administered lands were placed into one of four visual inventory classes (Class I, II, III, or IV). VRI classes for each of the IOPs are presented in the inventory.

4.1.5.2 Cultural and Historic Resource and Settings Inventory

Consistent with BLM Manual 6280 and the Gateway West PA (see Section 3.3.1.1 of the SEIS), the cultural and historic resource inventory utilized the numerous literature

reviews, 15 percent sample surveys (Class II), intensive pedestrian surveys (Class III), trails study (Tetra Tech and URS 2011), emigrant diaries, and public comments from interested groups and individuals. Previously recorded cultural and historic resources associated with the Oregon NHT and North Alternate Study Trail were identified as IOPs and visited by the field team to confirm their location and condition and whether they would serve as contributing segments or sites to the NRHP-eligible Oregon NHT. In addition to assessing the locations of these previously recorded resources, field teams also collected data about the physical characteristics, setting, historic integrity, and NRHP contributing status of other segments of the designated Oregon NHT, associated heritage resources (routes and/or sites), and North Alternate Study Trail at each IOP (as applicable).

4.1.5.3 Recreation and Travel Management Opportunities Inventory

Utilizing background literature, such as BLM recreation-related websites, EISs associated with BLM RMPs, and publicly available recreational travel maps within the AUs, the inventory of recreation and travel resources included a three-tiered identification effort. The first tier included NHT-related resources and experiences consisting of, but not limited to, trail interpretation or vicarious trail-based recreational opportunities. The second tier consisted of identifying recreational opportunities (potentially dispersed) that may or may not be related to the NHT such as hiking, trail use, hunting, fishing, wildlife viewing, camping, or other activities. The final tier consisted of identifying campgrounds, day-use areas, or other developed or dispersed recreational sites that could be near but not necessarily related to the NHT.

4.1.5.4 Natural Resources and Settings Inventory

The Gateway West FEIS provides pertinent information related to natural resources and settings situated within the AUs (see Sections 3.6, 3.7, 3.8, 3.10, and 3.11 of the FEIS). Some natural resource qualities, values, and settings serve to influence trail experiences and may support the primary use or uses of the Oregon NHT, although much of the natural condition within the AUs has been altered since the Oregon NHT was used. An inventory of natural resources and settings was performed during fieldwork at each IOP to assess extant geologic features, water sources, native vegetative settings, and invasive vegetation. Additional information was collected using aerial photography to gauge the extent of man-made alterations to the natural setting.

4.1.5.5 Other Landscape Elements

Other landscape elements include additional components that support or detract from the trail, including existing transmission lines, wind farms, communication towers, transportation routes, adjacent land uses, land ownership, and the extent of these cultural modifications. Additional variables within the viewshed, including noise, sights, smells, and other existing conditions, are also considered for their role within and modification to the Oregon NHT landscape.

4.2 Impacts Assessment Methodology

4.2.1 Visual Resource Impact Methodology

Generally, impacts to visual resources refer to the change in aesthetic values resulting from modifications to the landscape. For this Manual 6280 study, the changes in the

visual resources, values, qualities, and settings associated with the Oregon NHT and North Alternate Study Trail were analyzed by using the VRI and the general concepts of the BLM's VRM system. The VRM's use of KOPs and visual contrast rating forms (BLM 1986b) provided the principal means of analyzing Project impacts to aesthetic components of the trails.

For the analysis here, the IOPs visited during field data collection were also utilized as KOPs to provide a well-distributed assessment of impacts across the project area and to include both stationary platforms (e.g., scenic overlooks, trailheads) and linear platforms (e.g., trails, scenic roads, floatable rivers). The contrast rating forms prepared for each KOP, therefore, provided a determination of the level of contrast expected for each KOP. The levels of Project contrast are discussed in Table 2, which presents thresholds for impacts that would be classified as high, moderate, and low. High impacts would generally result in a potential change in the scenic quality while a low impact would have a minimal effect on scenic quality. Project simulations were prepared to provide examples of Project features at key locations, to verify the validity of the contrast ratings taken in the field, and to provide evaluators with examples of Project impacts to visual, cultural, recreational, and natural resources, qualities, values, and settings. These simulations are presented in Attachment D to this report.

In general, existing cultural modifications, such as energy infrastructure, typically diminish an AU's scenic quality. In those AUs with a lower scenic quality rating, the potential for adverse impacts to visual/scenic resources is reduced due to the existing visual intrusions. These cultural modifications primarily consist of wind farms or existing transmission lines that cross or parallel the trail within views facing Project routes. Generally, the route's visual contrast is reduced due to these types of existing cultural modifications. In areas where a route has a strong visual contrast but will not diminish a Scenic Quality Rating threshold, the impact is considered moderate. In areas where a route has a moderate visual contrast but will not diminish a Scenic Quality Rating threshold, the impact is considered low.

Project simulations were prepared to provide examples, at key locations, to verify the validity of the contrast ratings taken in the field and to provide evaluators with examples of Project impacts to visual, cultural, recreational, and natural resources, qualities, values, and settings.

Table 2. Project Impact Assessment Thresholds

Threshold Level	Resource Types
High (Adverse Impact for Cultural/Historic)	Scenic/Visual Resources – Contrast produced by the Project would demand attention and dominate views from the trail centerline where form, line, color, and texture of Project components would be incongruent with existing landscape or historic features. – High-quality, diverse, and rare or unique scenery (Class A or B) would be modified where the setting is a defining factor for the "high potential route segments" or as seen from historic properties and/or interpretive areas, or scenic trail centerlines. Historic and Cultural Resources – Characteristics of historic properties located in the trail corridor and seen from the trail centerline would be modified to the extent that the NRHP eligibility of the trail segments and related historic properties affected would be compromised. The effect would be considered an "adverse impact," which would also be consistent with Section 106 of the NHPA. Recreation, including Travel Management – Intact resource values, including recreation and National Trail-related travel management opportunities and values would be substantially compromised by the Project. These values would no longer contribute to the character of the trail. Natural Resources – Natural values, including any key contributing values and characteristics would be substantially compromised by the Project (i.e., a riparian area adjacent to a route segment follows what would be cleared for access roads). These values would no longer contribute to the character of the trail. Other Landscape Elements – Presence of developments; facilities; landscape modifications; existing land uses; valid existing rights; surface, sub-surface, or other interests in land ownership; and other variables such as sights, smells, and other experiences that may impact the trail experience. Areas where Project facilities would be located in proximity to, or parallel with (but not immediately adjacent to), landscape modifications that exhibit similar form, line, color, and texture.
Moderate	Scenic/Visual Resources – Contrast produced by the Project would attract attention from viewers using the trail centerline, and Project components would be co-dominant with existing landscape features. – The inherent quality of interesting, but not outstanding, landscapes (Class B or C) would be modified as seen from historic properties and/or interpretive areas, or scenic trail centerlines. Historic and Cultural Resources – No Moderate measure. Impacts are assessed as either High (adverse pursuant to the NHPA) or low (not adverse pursuant to the NHPA). Recreation, including Travel Management – Intact resource values, including recreation and National Trail-related travel management opportunities and values, would be modified by the Project but would remain suitably intact and continue to contribute to the character of the trail. Natural Resources – Natural values, including any key contributing values and characteristics, would be modified by the Project but would remain suitably intact and continue to contribute to the character of the trail.

Table 2. Project Impact Assessment Thresholds (continued)

Threshold Level	Resource Types
	Other Landscape Elements – Presence of developments; facilities; landscape modifications; existing land uses; valid existing rights; surface, sub-surface, or other interests in land ownership; and other variables such as sights, smells, and other experiences that may impact the trail experience. – Areas where Project facilities would be located in proximity to, or parallel with (but not immediately adjacent to), landscape modifications that exhibit similar form, line, color, and texture.
Low (No Adverse Impact/No Effect for Cultural/Historic)	Scenic/Visual Resources – Contrast produced by the Project would not be readily apparent from trail centerlines and would be subordinate in the context of existing conditions. – Minimal change would occur to the existing character of interesting and common landscapes (Class B or C) as seen from historic properties/interpretive areas, or scenic trail centerlines. Historic and Cultural Resources – Characteristics of historic properties located in the trail corridor and seen from the trail centerline and the trail segments affected would be modified, but their eligibility for listing on the NRHP would likely not be affected. This would be classified as "no adverse impacts" or "no impact" depending upon the presence of historic properties, consistent with Section 106 of the NHPA. Recreation, including Travel Management – Intact resource values, including recreation and National Trail-related travel management opportunities and values, would be modified negligibly by the Project. Contributing values would continue to define the character of the trail. Natural Resources – Natural values, including any key contributing values and characteristics would be modified negligibly by the Project. Contributing values would continue to define the character of trail. Other Landscape Elements – Presence of developments; facilities; landscape modifications; existing land uses; valid existing rights; surface, sub-surface, or other interests in land ownership; and other variables such as sights, smells, and other experiences that may impact the trail experience. – Areas where the Project would be located in proximity or parallel to an existing transmission line facility with similar landscape modifications and structural elements in regard to form, line, color, and texture, or screened from viewing locations associated with the trail such that the landscape is perceived to be unaltered.

4.2.2 Cultural and Historic Resource Impact Methodology

Impacts to cultural and historic resources, values, qualities, and settings associated with the Oregon NHT and North Alternate Study Trail were assessed during the field study at each individual IOP/KOP. For those trail segments that are intact and contribute to the NRHP significance of the trail impacts were assessed by evaluating how character-defining features and historic integrity of the NRHP-eligible segment of the trail were altered. In general, an "adverse impact" occurred when the NRHP integrity of the trail (i.e., location, design, setting, materials, workmanship, feeling, and association) was diminished by Project features. This would occur, for instance, if a Project element was

constructed on the trail or is located close to or would obstruct views from the trail, thus diminishing the trail's integrity of setting, feeling, and association. If the Project affected the trail, such as if the Project were visible from the trail but its visual impact was lessened by vegetation, intervening topography, lack of skylining, and/or sufficient distance so that it did not diminish the trail's integrity of setting, then a recommendation of "no adverse impact" was made. A "no impact" recommendation was made when the Project was not visible or when an eligible trail segment was not present. These findings would be consistent with the thresholds for Project effects to historic properties established in 36 CFR 800.5. For the purposes of the cultural resources analysis for the Manual 6280 study, the terms "effect" and "impact" are interchangeable.

4.2.3 Recreation and Travel Opportunities Impact Methodology

Project impacts to recreation and travel opportunities were assessed to determine whether the intact values, qualities, resources, and settings would be substantially compromised, modified, or left intact at each IOP/KOP. The impact assessment accounted for a wide variety of potential users including those that may hike the Oregon NHT or North Alternate Study Trail, follow the trails via the BLM's Backcountry Byway or NPS's ATR, or those who utilize recreation and travel opportunities in the area that may or may not be trail oriented. Thresholds of high, medium, and low were assigned based on the degree to which the recreational experience, vicarious experience, or travel opportunity was compromised.

4.2.4 Natural Resource Impact Methodology

Natural values that contributed to the salient characteristics of the respective trails were analyzed during the impacts analysis. This analysis included an assessment of impacts to landscape-defining trail-related characteristics immediately surrounding and within the viewshed of HPHSs and HPRSEGs or landscape features identified by original trail users. The degrees to which these natural characteristics would be substantially compromised, modified, or modified negligibly by the proposed Project were assessed at each IOP/KOP. Impacts assessed could include whether the Project could remove or alter vegetation, natural and geological features, or soils that characterize the respective trail's landscape.

4.2.5 Other Landscape Elements

The presence of other landscape elements in the Project area and how these elements will interact with the Project plays an integral role in the impact assessment. Existing energy developments such as wind farms and transmission line corridors, cellular facilities situated on promontories, and the mosaic of property ownership and varying land uses, for instance, all affect how landscape changes caused by the Project within the APAI are assessed. In some instances, the Project's visually inferior placement in relationship to existing transmission lines reduces the Project's level of impact, but its prominent position in front of an existing wind farm may accentuate the Project's level of impact. The impact analysis for visual, cultural/historic, recreation, and natural resources took these existing landscape elements into account when determining the degree to which these other landscape elements increased or decreased the level of potential Project impacts.

5 INVENTORY RESULTS (AFFECTED ENVIRONMENT)

The inventory results section begins with a summary of the nature and purposes of the Oregon NHT, as established in the Oregon Trail Comprehensive Management and Use Plan (CMUP) and as articulated in the RMPs that govern BLM-managed land in the inventory area. The discussion is organized within the five AUs defined for the inventory area (numbered 1 through 5). One of the AUs includes all of the North Alternate Study Trail. Each of the AUs is characterized in terms of visual, historic and cultural, recreational, and natural resources, qualities, and values. Each corresponding IOP is described within its respective AU. Representative photographs taken from each IOP are provided in Attachment B.

5.1 Overview

The Oregon NHT is a network of trail segments, river crossings, and sites that stretch across 2,282 miles of the western United States that provided a vital transportation link to the western frontier from the settled lands of the east. The Oregon NHT represented the principal route of westerly migration from Missouri to southern Idaho, Oregon, and northern California. The trail was originally formed by Native Americans, and used by European-American explorers and fur trappers in the early nineteenth century.

While the Oregon Trail facilitated settlement of the Oregon Territory in the mid-nineteenth century, particularly in the Willamette and Columbia River valleys, the trail also had significant impacts upon Native Americans. With the increase in settlers, water sources were soon diverted to agricultural enterprises that converted formerly fertile grasslands into agricultural production and ranges for livestock. This conversion quickly destroyed the grasses and root crops that represented staples in the subsistence lifestyles of the region's Native Americans.

By the mid-1840s, the Oregon Trail had become a major, nationally recognized thoroughfare for emigrants making their way west. During the trip, some emigrants wrote in diaries often meant for publication in county newspapers or to guide relatives intending to make the same journey the following season. Others described the journey in letters sent after travel had been completed. Over 800 diaries and day journals kept by those who made the overland journey have been published or catalogued in archives and many more remain in family collections. Many emigrant diaries contained information about the route, watering places, areas to feed cattle and oxen, and the quality of grasses along the way (Schlissel 2004). They also describe outstanding landscape features, hardships experienced, and interactions with Native Americans. The Snake River crossing, particularly Three Island Crossing, figures prominently in the diaries as one of the more difficult obstacles that emigrants faced. These diaries are a primary source in illustrating the trail's historic setting and outstanding landscape features noted by the emigrants on this significant journey. Emigrants generally traveled through the southwestern Idaho portion of the Oregon Trails and its alternates between July and September. Camps were made at junctions were the trail left the Snake River (not knowing when they would see water again they camped). This was also a good location to bury heavy but valuable items, such as a blacksmith's tool kit, in hopes that they could return the following season to retrieve them (La Salle 2011).

Portions of the Oregon Trail continued to be used into the late 1870s, though many became wagon roads during the mining booms. Wider use of railroads and automobiles after the 1890s caused many segments of the trail to be abandoned as road alignments were altered and road surfaces improved. Beginning in the early twentieth century, a number of organizations erected at burial sites, springs, emigrant camps, and inscription sites along prominent trail segments (Hutchison and Jones 1993).

With the passage of the NTSA in 1968, the National Trails System was established to provide a means for managing significant national trails and to ensure that agencies consider effects of proposed projects to these resources. The Oregon NHT was established in 1978. Since that time, federal agencies have considered and integrated the Oregon NHT into their resource planning documents and have developed key partnerships to enhance the agency's ability to manage the Oregon NHT's resources.

Management of the NHT and its associated resources is dictated through a NPS CMUP, which provides for coordinated action between federal, state, and private entities to enable opportunities for use and interpretation along the various identified segments of the water, land, and associated motor routes.

5.1.1 Primary Purpose

The nature and purposes of a national historic trail are defined as the character, characteristics, and congressional intent for a designated National Trail, including the resources, qualities, values, and associated settings of the areas through which such trails may pass; the primary use or uses of a National Trail; and activities promoting the preservation of, public access to, travel within, and enjoyment and appreciation of such trails. In 1998, the NPS developed a CMUP for the Oregon NHT and described the trail's purpose "to identify, preserve, and interpret the sites, route, and history of the Oregon Trail for all people to experience and understand," and to "commemorate the westward movement of emigrants to the Oregon country as an important chapter of our national heritage" (NPS 1998).

5.1.2 Primary Use

The Oregon NHT CMUP (1998) identifies a variety of trail uses, which include interpretation, heritage tourism, media interest (manifested by production of movies and documentaries), walking, biking, horseback riding, historic reenactments of the trails experience, and commemorative activities such as trail visitation, driving along ATRs and BLM backcountry byways, reading interpretive brochures and publications, and visiting associated museums and educational facilities. The NPS has also established ATRs for the Oregon NHT within the Project area. Idaho State Highway 78 and I-84 are a part of that system (NPS 1998; NPS 2008). While not mentioned in the CMUP, the BLM has also established the Main Oregon Trail Backcountry Byway along the "North Trail" of the Oregon NHT (BLM and IOCTA 2009).

The primary use or uses of the Oregon NHT are not specifically defined under existing BLM-managed land management documents such as the Bruneau MFP (BLM 1983) or the Owyhee District RMP (BLM 1999), but both documents refer readers back to the applicable CMUP prepared by NPS as including the management principles that the respective districts will follow to protect the visual and historic values of the NHT. The

Bruneau MFP designates a 0.5-mile corridor as a Special Recreation Management Area (SRMA), which includes an interpretive site near Cove Recreation Site, to be guided by the NPS management plan.

The recently approved (September 14, 2015) Jarbidge RMP notes that the 16,384-acre Oregon Trail SRMA includes such recreational opportunities as hiking, wildlife viewing, and natural scenery and educational activities. It also notes that there are "some opportunities for isolation from man-made sights and sounds in a predominantly unmodified environment. Concentration of visitors is low, but evidence of other area users is present" (BLM 2015a). The SRBOP RMP (BLM 2008) acknowledged the intact visual characteristics of the Oregon NHT when it established a visual protection corridor within the Birds of Prey Avoidance Area that included the Oregon NHT (in addition to other sensitive resources).

5.2 Federal Protection Components, Heritage Resources, and Auto Tour Routes

The NTSA and BLM Manual 6280 mandate assessment of impacts to Federal Protection Components, Heritage Resources, and ATRs. Federal Protection Components include HPHSs and HPRSEGs and other land- and water-based components of a designated NHT located on federally owned land that meet the NHT criteria listed in the NTSA and that are identified in trailwide CMUPs, RMPs, and implementation plans. ATRs are defined as those roads that parallel the NHT and provide opportunities to commemorate and/or interpret the historic route as an alternate experience. Table 3 provides a list of Federal Protection Components and ATRs listed in the Oregon Trail CMUP that are situated in the APAI (NPS 1998). Only Canyon Creek Stage Station (HPHS No. 92), C.J. Strike Ruts (HPHS No. 100), North Trail (HPRSEG No. 8), Three Island Crossing, and Sinker Creek (HPRSEG No. 9) are situated on lands administered by the BLM. The Utter Creek Massacre (HPHS No. 101) likely occurred on private lands, but an interpretive panel is situated on BLM-managed land. BLM Manual 6280 also requires an inventory and impacts assessment of "Heritage Resources," which are those trail segments and/or sites that are likely associated with the Oregon NHT but are not officially designated. Table 4 provides a summary of trail mileage by AU that includes the designated Oregon NHT route, represented as "NHT[1]," Heritage Resources as "NHT[2]," and the ATRs as "NHT[3]." Table 4 provides the respective mileage of the Oregon NHT resources situated on BLM-managed land.

Table 3. Federal Protection Components and Auto Tour Routes within the APAI

Federal Protection Components Name and No.	Site/ Segment #	Location	Description	AU #	NRHP Status	Ownership
Thousand Springs Complex State Park	HPHS No. 87	Gooding/Twin Falls County, ID	Emigrant Stopping Point and Natural Feature	AU1	N/A	State
Upper Salmon Falls	HPHS No. 88	Gooding/Twin Falls County, ID	Rapids, Natural Feature	AU1	N/A	State
Three Island Crossing State Park	HPHS No. 89	Elmore County, ID	Oregon Trail Crossing of Snake River	AU2	NRHP Listed	BLM; State
Teapot Dome Hot Springs	HPHS No. 90	Elmore County, ID	Hot Springs, Natural Feature	AU2	N/A	Private/State
Rattlesnake Stage Station	HPHS No. 91	Elmore County, ID	Stage Station	AU2	N/A	Private
Canyon Creek Stage Station	HPHS No. 92	Elmore County, ID	Stage Station	AU2	N/A	BLM
Inscription Rock	HPHS No. 93	Elmore County, ID	Emigrant Inscription Point	AU2	N/A	Private
Ditto Station	HPHS No. 94	Elmore County, ID	Stage Station	AU2	N/A	Private
Indian Creek Station	HPHS No. 95	Elmore County, ID	Stage Station	AU2	NRHP Listed	Private
C.J. Strike Ruts	HPHS No. 100	Owyhee County, ID	Intact Oregon Trail Ruts	AU3	N/A	BLM
Utter Massacre Site	HPHS No. 101	Owyhee County, ID	Historic Massacre Site	AU4	N/A	Private (Interpretive panel on BLM-managed land)
Givens Hot Springs	HPHS No. 102	Owyhee County, ID	Hot Springs, Emigrant Stopping Point	AU4	N/A	Private
Hagerman Fossil Beds	HPRSEG 7	Elmore and Twin Falls Counties, ID	High Potential Route Segments	AU1a and AU1b	N/A	NPS
North Trail High Potential Route Segment	HPRSEG 8	Ada and Elmore Counties, ID	High Potential Route Segment	AU2	N/A	BLM/Private/State

Table 3. Federal Protection Components and Auto Tour Routes within the APAI (continued)

Federal Protection Components Name and No.	Site/ Segment #	Location	Description	AU #	NRHP Status	Ownership
Sinker Creek High Potential Historic Segment	HPRSEG 9	Owyhee County, ID	High Potential Route Segment	AU4b	N/A	BLM/Private
Idaho State Highway 78	ATR	Gooding, Twin Falls, Elmore, Owyhee, ID	Auto Tour Route	AU1-AU5	N/A	State
Interstate 84	ATR	Gooding, Twin Falls, Elmore, Owyhee, ID	Auto Tour Route	AU1-AU5	N/A	State

Table 4. Miles of Oregon Trail Resources on BLM-managed Land within Analysis Units

Analysis Unit	BLM Field Office(s)	Length of Oregon Trail Resources on BLM-managed land (in miles)		
		Congressionally Designated Trail (NHT[1])	Oregon Trail Segments (NHT[2])	Oregon Trail ATR/Interstate 84/Idaho Route 78 (NHT[3])
1	Four Rivers, Jarbidge, Shoshone, and Burley	17.3	65.1	1.8
2	Four Rivers, Jarbidge, and Shoshone	24.6	55.6	27.3
3	Four Rivers, Bruneau, Jarbidge, and Shoshone	14.3	56.6	28.4
4	Four Rivers, Owyhee, and Bruneau	16.2	16.4	21.0
5	Four Rivers, Jarbidge, Shoshone, and Burley	30.8 (North Alternate Study Trail)	69.8	22.1

Note: Several of the Analysis Units (AU) overlap and are tailored to discrete Oregon NHT high potential route segments and high potential historic sites so the total number of miles of the Oregon NHT crossing all AUs is not consistent with the total length of Oregon NHT miles (for instance, as expressed in Table 1). Each AU contains a 15-mile buffer on either side of the designated Oregon NHT route (NHT[1]). The AUs also depict the locations of Heritage Resources (NHT[2]) and the auto tour routes (ATR) (NHT[2]).

5.3 Inventory Results

Between April 27 and May 2, 2015, a field inventory of the APAI was performed by AECOM and Tetra Tech with assistance from BLM staff. An interdisciplinary field team collected data from individual IOPs on the recreation, natural, visual, and cultural/historic resources, qualities, and values and associated settings of the Oregon

NHT and North Alternate Study Trail. Representative photographs taken from each IOP are presented in Attachment B.

Following fieldwork associated with the VRI, each AU received a Scenic Quality Rating based upon information collected from each IOP and a review of aerial mapping data. Table 5 provides the numerical scores used to develop the scenic quality ratings.

Table 5. AU Scenic Quality Ratings

Analysis Unit/Scenic Quality Rating Unit	Landform	Vegetation	Water	Color	Adjacent Scenery	Scarcity	Cultural Modification	Total Score	Scenic Quality Rating
1a	2	3	2	2	0	1	-4	6	C
1b	2	3	2	2	3	3	-2	13	B
2	4	3	2	3	0	3	-4	11	C
3	3	3	5	4	3	5	1	24	A
4a	1	5	3	3	3	1	-2	14	B
4b	5	3	3	5	5	5	0	26	A
5	3	3	1	1	0	1	-2	7	C

5.3.1 Inventory Results AU1

5.3.1.1 Visual Resources

AU1 includes the North Trail (Primary Route) of the Oregon NHT between the east end of the Study Area and Three Island Crossing where the trail diverges into two routes north and south of the Snake River.

For the purposes of the VRI, the AU is composed of two sub-units, delineated by developed agricultural land the relative lack of BLM-managed land (1a) and rural land that features larger undeveloped BLM parcels (1b). Table 6 lists the field and remote IOPs analyzed for the VRI within this AU. It should be noted that due to the relative lack of BLM-managed land in AU1a, there are no IOPs in AU1a.

Table 6. Analysis Unit 1 – Inventory Observation Points

IOP	AU Sub-Unit (for VRI)	IOP Description
C61	1b	Oregon NHT (SE of Three Island Crossing)
C95	1b	Oregon NHT (West Deer Creek Gulch)
C96	1b	Oregon NHT (a portion coincides with Kelton Rd)
C97	1b	Oregon NHT (Rosevear Gulch area)
C106	1b	Oregon NHT Trail Marker, near Bell Rapids Road
C107	1b	Kelton Road Marker
C108	1b	Oregon NHT Marker off of Bennett Mountain Road
C1504	1b	380-1 associated trail - Oregon NHT
C1509	1b	Oregon NHT Crossing-Route 8A
C1515	1b	Oregon NHT Crossing-Route 8G
C1529	1b	Three Island Crossing and Two Island Crossing Viewpoint[1/]

1/ Inventory Observation Point (IOP) C1529 is on state lands. Due to its location on state lands, this IOP was not analyzed for impacts consistent with BLM Manual 6280. This IOP was chosen as an inventory point to assess scenic quality in this AU.

Scenic Quality Rating Units

This segment of the trail largely passes through Class B (AU 1b) and C (AU 1a) scenic areas. The landscape is characterized by rolling hills with no dominant landform features and a limited variety of sagebrush and grassland vegetation. The trail lacks a major visual interaction with the Snake River in this area, except for AU1's west end at Three Island Crossing. Much of this AU is bisected by a series of gulches and small seasonal creek beds that are not dominant features in the landscape. Color variations are subtle, with little contrast in most areas aside from Three Island Crossing. The area is distinct within the region due to the unique concentration of gulches (1b), although the agricultural landscape (1a) is fairly typical. Several transmission lines cross the trail and setting within the AU. Coupled with the surrounding wind farm development, these cultural modifications introduce discordant forms and lines in the landscape and detract from the AU's visual harmony.

Sensitivity Level Rating Units

The entirety of AU1 is rated as highly sensitive, due to the congressional designation and associated protection measures for this segment of the Oregon NHT, which includes the Hagerman Fossil Beds HPRSEG, North Trail HPRSEG, Upper Salmon Falls HPHS, and Three Island Crossing HPHS – all Federal Protection Components of the Oregon NHT.

Distance Zones

AU1 includes viewsheds from the trail within the foreground-middleground (up to 5 miles), and background (5-15 miles) distance zones, as well as seldom seen areas. Travel route viewers along I-84/US 26 and US 30, which serve as the NPS ATR through this AU, will pass through the background in AU1a and the foreground/middleground in AU1b. Seldom seen areas are generally limited to small segments of the Snake River Canyon and valleys within and south of the Bruneau Desert.

5.3.1.2 Cultural/Historical Resources

Within AU1, the trail passes between the Snake River to the north and the Bruneau Desert to the south. Several braided, non-Oregon NHT segments follow along the main route, and the trail connects with Castleford Road and Kelton Road. The historic setting is characterized by elevated plateaus and gentle sloping hills met with gulches, including Tuana Gulch, Cassia Gulch, Little Pilgrim Gulch, Big Pilgrim Gulch, Deer Gulch, and Rosevear Gulch. The Snake River is a prominent linear feature in the historic setting.

AU1 includes two HPRSEGs of the Oregon NHT, separated by a large grouping of wind farms and agricultural land at Black Mesa. The Hagerman Fossil Beds HPRSEG includes a 4-mile trail segment within the Hagerman Fossil Beds National Monument. The segment begins at the mouth of Yahoo Gulch, where, according to the NPS CMUP, emigrants camped and grazed their stock. The segment climbs a ridge adjacent to the Snake River, which features a narrow spot that Jesse Applegate called the "Devil's Backbone" (NPS 1998). Several trail artifacts are in the museum at the National Monument.

Additionally, a portion of the North Trail HPRSEG extends from the Twin Falls – Elmore County line through AU1 to the crossing at Glenns Ferry. According to the NPS CMUP, this HPRSEG contains the best overall stretch of the Oregon Trail left in Idaho and features scenery of the Snake River Valley. The segment heads northwest across rangeland, following trail remnants and passing near Pilgrim State Station and the camping area at Little Pilgrim Gulch. The route crosses Black Mesa and meets AU2 and AU3 just south of Glenns Ferry. The setting of the North Trail HPRSEG has been diminished since the 1998 NPS CMUP for the Oregon Trail with the construction of several windfarms on private lands within the HPRSEG's viewshed.

A large grouping of wind farms and agricultural land centered on Black Mesa Farms separate the two HPRSEGs. The wind farm properties are also frequently bisected by existing transmission lines. These cultural modifications are present in the viewshed and detract from the historic setting.

The Cultural Resources study identified four previously recorded historic sites associated with the Oregon NHT in AU1 (Table 7).

Table 7. Previously Recorded Historic Sites Associated with the Oregon Trail in AU1

Site No.	Site Class	Site Type	Description	NRHP Recommendation
10EL1372	Historic	Historic Road	Oregon Trail, Kelton Road	Unevaluated
375-1	Historic	Historic Road	Segment of the Oregon Trail primary route (North Trail) southeast of Glenns Ferry	Eligible/Contributing
378-1	Historic	Historic Road	Segment of the Oregon Trail primary route (North Trail) southeast of Glenns Ferry	Eligible/Contributing
380-1	Historic	Historic Road	Segment of the Oregon Trail primary route (North Trail) southeast of Glenns Ferry	Eligible/Contributing

The Pilgrim Gulch Area and the area approaching Two Island Crossing and Three Island Crossing are highlighted in emigrant diaries.

Pilgrim Gulch

The Little Pilgrim Gulch area hosted a significant emigrant campground and access point to the Snake River. In addition, evidence of several alternate routes is present in the Big Pilgrim Gulch area. John S. Ziebar noted on August 27, 1851: "It was ¾ of a mile to the water and down a steep way probably 300 feet below the wagons" (Hutchison and Jones 1993).

Two Island Crossing and Three Island Crossing

The Oregon Trail Primary Route (North Trail) and South Alternate intersected at Three Island Crossing. Pioneers forded the Snake River there until 1869, when Gustavus Glenn established a commercial ferry about 2 miles upstream. The crossing has been described as "the most important and difficult river crossing in Idaho. Crossing the Snake River was always dangerous, but when the water was low enough, everyone able to cross did so to access the more favorable northern route to Fort Boise" (NPS

1998). Emigrants chose to either continue on the preferred North Route by fording the Snake River at Three Island Crossing (AU2) or if conditions were unfavorable, remain on the south side of the river along the South Alternate (AU3). On the undulating hills leading down to Three Island Crossing, many emigrants lightened their wagon loads by, among other things, sawing off and shortening the ends of their wagons. The remains (now archaeological sites) would have been left between Salmon Falls Creek and Three Island Crossing (La Salle 2011).

In July 1851, P.V. Crawford described the landscape on the approach to Three Island Crossing and the popular animal watering area at Two Island Crossing:

> *This day* [July 30] *we traveled twelve miles. The first four or five miles were very hilly and sandy, then four miles of level sandy plain. Then down a ravine to a dry channel, that has the appearance of being a large creek at times, but is at this time perfectly dry. We followed the channel down to the river. Here camped, but had to swim our cattle across the river to grass. This is now called the upper crossing of Snake river. Here we decided to cross over to the north side* (Idaho State Historical Society Reference Series 1995).

Table 8 describes the resources, qualities, and values of the Oregon NHT observed from selective IOPs in AU1.

Table 8. IOP Descriptions of Oregon NHT Resources, Qualities, and Values in AU1

IOP	Character Defining Features
C61	Two-track road still in use–not marked. Nine feet wide and runs northeast-southwest.
C95	Barely visible portion of Oregon NHT; a flat road surface.
C96	Two deep swales, each measure about 12 feet across and up to 3 feet deep. The swales descend an east-facing slope. No artifacts noted.
C97	None visible. Trail could not be seen. Only a Carsonite marker is present.
C106	Two deep swales 12–13 feet wide and 12–16 inches deep. The trails converge at a Carsonite marker. The main swale runs generally north-south. The other, narrower trail turns east and goes downhill. A rusted sanitary can with interior friction lid (coffee can) noted.
C107	Deep rut or swale present is up to 12 feet wide and several feet deep. Runs generally southeast-northwest.
C1504	An 8-foot wide, two-track road runs north-south parallel to a fence. Appears to be a modern two-track.
C1509	Deep swale, 12–15 feet wide and up to 4 feet deep. Carsonite markers present. Tin can scatters and perforated sheet metal noted alongside swale.
C1515	About a 10-foot wide swale up to 12 inches deep. One or two parallel, shallow swales also noted.

5.3.1.3 Recreation and Travel Opportunities

Recreation opportunities managed by the BLM within AU1 largely consist of Carsonite trail markers situated along the North Trail HPRSEG. The northeastern edge of this AU connects with the BLM Backcountry Byway. No trailheads or other improved access points, however, were identified during fieldwork on BLM-managed land associated with the byway because the majority of the byway is located within AU2. Road circulation generally facilitates access to the North Trail HPRSEG in this AU, but the roads vary in condition. The wide, well-graded gravel Bell Rapids Road provides easy direct access

to the North Trail HPRSEG from well-traveled two-track dirt roads. Other roads, such as Black Mesa Road, are in poor condition, with single- and double-track dirt paths that make driving difficult or require foot travel to reach the Oregon NHT.

Two IOPs associated with the eastern terminus of the Backcountry Byway (C1529 and C61) are examples of opportunities for vicarious experiences along the trail near the Three Island Crossing area. Additional IOPs in AU1, such as C106, C107, C61, C96, C1509, and C1515, allow opportunities to experience trail segments with high physical integrity and high interpretive potential. While these IOPs lack interpretive panels, Carsonite markers identify the location of the trail. Little to no evidence of other recreational activities in these areas was recorded during fieldwork.

Trail-related interpretive opportunities are largely limited to non-BLM properties such as the Hagerman Fossil Beds National Monument area (managed by the NPS), which contains an intact segment of the North Trail HPRSEG. Three Island Crossing State Park contains an interpretive overlook on the south side of the Snake River with a view of BLM-owned parcels that contain an intact segment of the North Trail HPRSEG. Other recreational opportunities in the area consist of camping, RV parks, informal ATV use, and dispersed recreation including hunting and fishing along the Snake River. All of these opportunities, however, are not on BLM-managed lands and may or may not be associated with Oregon NHT-related recreational opportunities. Trail-related camping is available at Three Island Crossing State Park and Hagerman Fossil Beds National Monument.

5.3.1.4 Natural Resources

Most of the ground surface in AU1 is covered with vegetation, including a combination of open shrub-steppe and grassland that has been invaded by cheatgrass. Large sagebrush and rabbitbrush primarily comprise the overstory, while cheatgrass is the most common understory species. Other species include bunch grass, crested wheat grass, tower mustard, and lupine. Soil types are primarily silty sand and sandy silt, with some areas of scattered gravel.

The natural setting of this AU is defined by the Mt. Bennett hills north of the Snake River, with the snow-covered peaks of the Soldier Mountains beyond these hills. Black Mesa and Flint Mesa are centrally located within the AU. Several gulches carve out the eastern half of the AU, including Cassia Gulch, Little Pilgrim Gulch, Big Pilgrim Gulch, and Deer Gulch. The Snake River Canyon and its drainages are more prominent in the western portion of the AU. The combination of these prominent geological landforms characterizes the AU's overall natural setting.

5.3.1.5 Other Landscape Elements

Landscape elements that support the trail in AU1 are discussed in the scenic, historic, recreation, and natural settings. The towns of Hagerman and Glenns Ferry are within 5 miles of the Oregon NHT but have minimal impact on the trail's resources, qualities, values, and settings. The primary transportation corridor is I-84, which passes within 5 miles of the trail to the north, but also serves as the NPS ATR. Other transportation elements, which include Bell Rapids Road, Bennett Mountain Road, secondary two-track roads, and localized OHV trails, moderately detract from the Oregon NHT's scenic and historic settings in limited areas. Multiple transmission lines pass through AU1,

including 500-kV lattice towers to the northeast, north, and northwest; and H-frame towers to the northeast and southwest. A large concentration of wind farms is located east of the trail near Buhl, and the multiple windmills are highly visible from most IOPs within AU1. Additional elements include wireless communications towers and microwave antennae to the south, north, and northeast.

Land near the trail in AU1 is primarily administered by the BLM, with one large wind farm and agricultural development at Black Mesa separating two trail segments. Agricultural fields, fencing, and some farm buildings are visible from, and in some instances obscure, the trail. In localized areas, cattle grazing diminishes the trail's immediate historic and natural setting.

5.3.2 Inventory Results AU2

5.3.2.1 Visual Resources

AU2 includes the North Trail (Primary Route) of the Oregon NHT, North Alternate Study Trail, and Goodale's Cutoff Study Trail and almost entirely encompasses the Main Oregon Trail Backcountry Byway. Table 9 lists the field IOPs analyzed for the VRI within AU2.

Table 9. Analysis Unit 2 – Inventory Observation Points

IOP	IOP Description
C120	Oregon NHT South Alternate
C1516	Alkali Springs Historic-Period Camping Area
C1517	Kelton Rd Recreation Site-Hot Springs Creek
C1518	Kelton Rd Recreation Site-Parallels OT Segment
C1519	Rocky Road Hiking Area and Trail Ruts
C1520	Interpretive Sign and Visible Ruts
C1521	Byway Road Parallels Oregon NHT Route
C1522	Interpretive Sign at Inscription Rock near Bowns Creek
C1529	Three Island Crossing and Two Island Crossing Viewpoint[1/]

1/ Inventory Observation Point (IOP) C1529 is on state lands. Due to its location on state lands, this IOP was not analyzed for impacts consistent with BLM Manual 6280. This IOP was chosen as an inventory point to assess scenic quality in this AU.

Scenic Quality Rating Units

This segment of the trail largely passes through Class C scenic areas. The landscape is relatively flat to the south and west, but bordered on the north and east by the Danskin Mountains, a dramatic mountain range that parallels the Oregon NHT through this AU and creates a distinct landscape element for trail users in the region. Some variety of vegetation is present, though sagebrush and grassland are the major types. Water features within the landscape include the Snake River, which is only prominent at Three Island Crossing and Two Island Crossing, as well as Morrow Reservoir and the hot springs located near Teapot Dome. The Danskin Mountains provide some variety and contrast in color, but overall, color is not a dominant part of the landscape. Multiple intersecting transmission lines and a concentration of wind farms detract from the scenic elements and are discordant cultural modifications within AU2.

Sensitivity Level Rating Units

The entirety of AU2 is rated as highly sensitive, due to the Congressional designation and associated protection measures for this segment of the Oregon NHT, as well as its inclusion of the Main Oregon Trail Backcountry Byway. The AU contains the North Trail HPRSEG, Three Island Crossing HPHS, Teapot Dome Hot Springs HPHS, Rattlesnake Station HPSH, Canyon Creek Station HPHS, and Inscription Rock HPHS – Federal Protection Components of the Oregon NHT. The North Alternate Study Trail and Goodale's Cutoff Study Trail are also situated in the AU. The Rattlesnake Station HPHS and Goodale's Cutoff Study Trail are not located on BLM-managed land.

Distance Zones

The Danskin Mountains limit the viewshed in AU2 to the foreground/middleground to the north and east of the trail, while the flat lands south and west of the trail provide a full viewshed beyond 15 miles in several areas. Travel route viewers along the Main Oregon Trail Backcountry Byway will pass through the trail foreground/middleground. Seldom seen areas are limited to the north side of the Danskin Mountains, as well as the Sailor Creek Basin south of Hammett and Glenns Ferry.

5.3.2.2 Cultural/Historical Resources

In AU2, the trail extends from Glenns Ferry and the Three Island Crossing area northwest through the AU towards Bonneville Point and Fort Boise. The route follows along the southwestern edge of the Danskin Mountains and the Bennett Hills and generally parallels US 26/I-84 approximately 6 miles to the southeast. Within this AU, the entire main route is part of the North Trail HPRSEG. Several braided, non-Oregon NHT segments of trail follow along the HPRSEG, many of which connect to the North Alternate Study Trail to the southeast.

AU2 begins at Three Island Crossing. Following Three Island Crossing, the trail passes through a series of flats, draws, creeks, and hollows. Starting in the southeast and moving northwest, the Oregon NHT passes over Cold Springs Creek, Hot Springs Creek, the Teapot Basin, Rattlesnake Creek, Canyon Creek, Ditto Creek, Sand Hollow, Smith Draw, Caldwell Draw, McLintyre Draw, and Indian Creek and then ends within Slaters Flat. The historic setting is characterized by this sequence of low flat valleys divided by occasional crevasses and dips within the landscape. Other significant features in the setting include Alkali Hot Springs, located along Hot Springs Creek and Lockman Butte, visible to the south where the trail crosses Canyon Creek.

AU2 includes seven HPHSs, all of which are located in Elmore County on private or state lands. Three Island Crossing State Park, located on the north side of the Snake River within the city of Glenns Ferry, is located entirely on state lands, but does contribute to the significance and setting of the North Alternate Study Trail. Both Three Island Crossing and Indian Creek Station—a historic stage station located on private lands—are listed on the NRHP. Two privately held stage stations are also located within this AU, neither of which is listed on the NRHP. These include Rattlesnake Stage Station and Ditto Station. The Canyon Creek Stage Station, recently placed under BLM management (October 2015), is also located within AU2. Teapot Dome Hot Springs, a natural hot springs is a feature on private and state lands, and Inscription Rock, an emigrant stopping point with historic inscriptions, is located on private lands. In

addition, all of the stage stations are within lowland areas surrounding creeks and have limited views of the trail.

Agriculture and grazing have created minor impacts on the historic setting, including erosion of the trail and some minor visual impacts related to agricultural properties. The greatest cultural modifications to the historic landscape in this area include extensive transmission lines to the southeast and south and large-scale wind farms located within the same vicinity. These cultural modifications are present in the viewshed and alter the historic setting.

One previously recorded historic site associated with the Oregon NHT in AU2 was identified in the Cultural Resources study (Table 10).

Table 10. Previously Recorded Historic Site Associated with the Oregon NHT in AU2

Site No.	Site Class	Site Type	Description	NRHP Recommendation
10EL1372	Historic	Historic Road	Oregon Trail, Kelton Road	Unevaluated

Emigrant diaries that document the Oregon NHT in AU2 focus primarily focus on Three Island Crossing, one of the Oregon Trail's most famous and perilous river crossings. The swift currents were notorious for overturning wagons and drowning pioneers and livestock. The diaries also describe Cold Springs Creek, Bennett Mountain, Rattlesnake Creek and Hot Springs, Canyon Creek, Bliss, and Teapot Dome and Hot Springs, distinctive natural features within AU2 that the pioneers noted along their route west.

Three Island Crossing

As one of the Oregon Trail's most famous and perilous river crossings (see Figures 1 and 2), Three Island Crossing narratives frequently appear in emigrant diaries. Prior to the opening of the Oregon Trail, Missionary Narcissa Whitman, traveling with her husband Marcus Whitman, first detailed the crossing on August 13, 1836:

> *We have come fifteen miles and have had the worst route in all the journey for the cart. We might have had a better one but for being misled by some of the company who started out before the leaders. It was two o'clock before we came into camp. They were preparing to cross Snake River. The river is divided by two islands into three branches, and is fordable. The packs are placed upon the tops of the highest horses and in this way we crossed without wetting. Two of the tallest horses were selected to carry Mrs. Spalding and myself over. Mr. McLeod gave me his and rode mine. The last branch we rode as much as half a mile in crossing and against the current too, which made it hard for the horses, the water being up to their sides. Husband had considerable difficulty in crossing the cart. Both cart and mules were turned upside down in the river and entangled in the harness. The mules would have been drowned but for a desperate struggle to get them ashore. Then after putting two of the strongest horses before the cart, and two men swimming behind to steady it, they succeeded in getting it across. I once thought that crossing streams would be the most dreaded part of the journey. I can now cross the most difficult stream without the least fear. There is one manner of crossing which husband has tried but I have not, neither do I wish to. Take an elk skin and stretch it over you,*

spreading yourself out as much as possible, then let the Indian women carefully put you on the water and with a cord in the mouth they will swim and draw you over. Edward, how do you think you would like to travel in this way? (Idaho State Historical Society Reference Series 1968).

Figure 1. Three Island Crossing of the Snake River, Idaho, Watercolor (circa 1932), William Henry Jackson, 1843-1942 (Denver Public Library Western Art Collection)

Figure 2. Three Island Crossing of the Snake River, Idaho (Patience Stuart, photographer, AECOM, 2015)

On August 21, 1851, nearly two decades later, Elizabeth Wood discussed the challenge of crossing with livestock:

> *We forded the Snake river, which runs so swift that the drivers (four to a team) had to hold on to the ox yokes to keep from being swept down by the current. The water came into the wagon boxes, and after making the island we raised the boxes on blocks, engaged an Indian pilot, doubled teams, and reached the opposite bank in safety. It is best in fording this river to engage a pilot* (Idaho State Historical Society Reference Series 1968).

According to later Oregon Trail diarists, most travelers crossed here in their wagon boxes. On August 7, 1852, Abigail Scott, traveling with her family from Illinois, wrote "emigrants were ferrying in their wagon boxes" (Holmes and Duniway 1986; Shirley 1998). The Conyer family "calked two wagon beds and used them as a ferry to cross the river, one tied before the other" (Rau 2001).

Interactions with Indian tribes were not always accommodating. On August 1, 1851, Crawford reflects on the crossing, the quality of grassland, and an experience with local Native Americans: "This day we completed crossing our fifteen wagons before night. Last night we had three horses stolen, and three more shot in the shoulders with arrows. Grass is good here, but Indians are very bad" (Idaho State Historical Society Reference Series 1968).

On September 24, 1844, Edward Evans Parrish described crossing on a calm day: "We crossed the river safely after noon today and camped on a fine bed of grass within sight of the ford. The river is rapid and the water middling low. The bottom is gravel of the prettiest kind and the water is clear. In consequence of two islands, side by side, we had to cross three streams" (Idaho State Historical Society Reference Series 1968).

Cold Spring Creek, South of Bennett Mountain

Cold Spring Creek is not a HPHS, but the area's rocky conditions impacted emigrant travel. In 1853, Elizabeth J. Goltra describes the area south of Bennett Mountain near Cold Spring Creek:

> *Saturday August 13th. We had a long hill to climb this morning and a very rocky one. It is almost useless to attempt to describe the road on this part of the trip. For several days we have had little else but rocks to travel over and it looks no better ahead. Mountains and hills rise up before us and when we get on the top of one we see another ahead still higher. Seven miles from camp we come to another creek, not much grass, 8 miles farther are 3 fine springs branches. Here we camped again having good feed. Drove 15 miles today* (University of Richmond 2015).

Hot Springs South of Teapot Dome

Teapot Dome Hot Springs is a series of small springs on the Oregon NHT North Route that occupy a basin 1,000 feet across at the Hot Springs Creek (NPS 1998). The springs branched in multiple directions and provided several areas for emigrants to camp. Famed explorer John C. Fremont wrote of the Hot Springs South of Teapot Dome on October 5, 1843:

> *In about nine miles the road brought us to a group of smoking hot springs, with a temperature of 164 [degrees]. There were a few helianthi in bloom, with some other low plants, and the place was green round about; the ground warm, and the air pleasant, with a summer atmosphere that was very grateful in a day of high and cold searching wind. The rocks were covered with a white and red incrustation; and the water has on the tongue the same unpleasant effect as that of the Basin spring on Bear river. They form several branches, and bubble up with force enough to raise the small pebbles several inches... These springs are near the foot of the ridge (a dark and rugged-looking mountain) in which some of the nearer rocks have a reddish appearance, and probably consist of a reddish-brown trap, fragments of which were scattered along the road after leaving the spring* (Jackson 1970 in Hutchison and Jones 1993).

Rattlesnake Creek and Hot Springs

The area near Rattlesnake Creek was established as an important stage station in 1864 and later as a freight stop for the Rocky Bar mining area. Prior to the stage station, however, emigrants camped near the creek and nearby hot springs. On August 14, 1853, Goltra describes Rattlesnake Creek (near Sun Valley Highway and Hot Springs Road intersection):

> *Drove 5 miles and came to another creek, 7 miles farther and we came to another creek, one half a mile from which are hot spring branches. Water not*

> *good. One mile farther and to the right of the road are the hot springs. These springs are very hot, almost boiling. Cannot hold my hand in the water 10 seconds. Four miles farther is Barrel creek. Good grass here. Camped again. Drove 17 1/2 miles to-day* (University of Richmond 2015).

Rattlesnake Creek Stage Station remained a major stage stop until the early twentieth century, with connections to gold mining operations on the Rocky Bar Road (Simpson 2001). Ben Holladay founded the station in 1864 as a stop on his new Overland Stage Line between Salt Lake City, Utah, and Walla Walla, Washington. Commodore William Jackson acquired the property in 1872 and ran the station for 3 years. In 1870, the Northwestern Stage Company acquired the overland line. Wesley C. Tatro initiated a weekly stage line from Boise to the South Boise mines and made stops at Rattlesnake to accommodate overland travelers. In 1875, Tatro made the station an overnight stop and Jackson quit as manager. A post office named Mountain Home was established in 1876 at the station. When the Oregon Short Line Railway was completed in 1883, the post office was removed to a new town site. The station served stages between the new town of Mountain Home and Rocky Bar until the stage route to South Boise was abandoned in 1914 (Idaho State Historical Society Reference Series 1984). The remains of the round rock fort built in 1878 and the old school house built in 1898 may still be seen in the area (BLM/IOCTA 2009).

Canyon Creek

Ten miles west of Rattlesnake Creek, Canyon Creek was also used as a campground and later established as a stage station. As early as 1843, emigrants sought out the creek bottom for its availability of water and lush green grass (Simpson 2001). At Canyon Creek (near Foothill Road and Mayfield Road), Elizabeth J. Goltra briefly describes the landscape at their camp on August 15, 1853: "Twelve miles farther is another creek. Some grass and a very rough sort of a road. Camped here" (University of Richmond 2015).

Canyon Creek Stage Station was established in the later years of the Oregon Trail. The family of Archibald Daniel homesteaded Canyon Creek Stage Station in 1873. The stage station was constructed of lava rocks from the surrounding canyon and wood floors and roof from the hillsides (Idaho Heritage Trust 2015). A breezeway between the station's two buildings allowed passengers safe passage into the station from the stagecoach. Food and lodging were provided for up to 50 teams and their drivers (Simpson 2001). The station operated until 1921 and was destroyed by fire in 1976, leaving only its stone wall structure (Idaho Heritage Trust 2015). The Station was recently acquired by the federal government and placed under BLM management (October 2015).

Table 11 describes the resources, qualities, and values of the Oregon NHT observed from selective IOPs in AU2.

Table 11. IOP Descriptions of Oregon NHT Resources, Qualities, and Values in AU2

IOP	Character-Defining Features
C108	Two parallel ruts, up to 12 inches deep, and white Carsonite markers. No period artifacts noted.
C1516	Faint two-track passing through tall sagebrush, marked with concrete BLM post markers. No period artifacts noted.
C1517	Two-track road with concrete post markers. Road is still in use.
C1518	Gentle slope below Teapot Dome. Shallow swale or trail visible. Runs northwest/southeast and is 15 feet wide. No artifacts. Some rocks have been pushed to the south edge of trail. White opalite gravel is noted.
C1519	Trail swale is readily visible. One rut noted. This is a Class 1 with excellent integrity. Carsonite markers have been found broken off on ground. There are basalt cobbles in the trail.
C1520	Ridgetop in rolling foothills north of Snake River Valley. Multiple ruts pass over the ridgetop, running east-west. Ditto Creek is about 300 meters north. Scattered sagebrush is on ridgetop. No period artifacts noted.
C1521	Narrow road bed visible uphill north of Mayfield Road. A deep rut or swale is visible below the modern road.
C1522	Near Bowns Creek. No visible evidence of the trail. Likely followed the route of the current gravel road (Mayfield Road). No period artifacts noted. The inscription rock has painted and carved inscriptions—black letters produced with axle grease or charcoal. A Backcountry Byways marker is located on the north side of Mayfield Road at this location.

5.3.2.3 Recreation and Travel Opportunities

The only BLM-managed recreation site within AU2 is the Morrow Reservoir Dispersed Recreation Site. This recreation area is seldom used and no visible signs of the Oregon Trail were seen during fieldwork. There are no BLM markers and no visible ruts. The Oregon Trail is located 1.2 miles southwest of the reservoir and recreation may or may not be related to the trail at this location.

The Backcountry Byway is a recreational tour route located primarily within AU2. The byway passes many historic and natural sites associated with the Oregon Trail. These include the Alkali Springs Historic Camping Area (IOP C1516); the Kelton Road Recreation Site-Hot Springs Creek Area (IOP C1517); a Kelton Road Recreation Site that Parallels the Oregon Trail (IOP C1518); the Rocky Road Hiking Area, a dispersed hiking area along a rocky portion of the North Alternate Study Trail with BLM Carsonite markers and clear ruts (IOP C1519); an interpretive sign with visible ruts (IOP CC1520); an interpretive site where the byway parallels the trail that exhibits ruts with high integrity (IOP C1521); and an interpretive sign at the Inscription Rock near Bowns Creek (IOP C1522).

Within AU2, trail-related recreation is focused around the Backcountry Byway Route. Additional BLM recreation opportunities within this AU include sporadic OHV trails and Jeep trails and dispersed hunting. No camping was evident within this AU. The historic stage stations, such as the Rattlesnake Station and Canyon Creek Station, are considered recreational interpretive sites related to the Oregon NHT, but were associated more with the wagon roads, which utilized the trail in later years. The Rattlesnake Station is on private lands but the Canyon Creek Station was recently

donated to the federal government and is now managed by the BLM as of October 2015.

5.3.2.4 Natural Resources

The ground surface in AU2 is fully covered by fairly dense shrub-steppe vegetation, composed primarily of sagebrush and bitter brush. Cheatgrass is the dominant understory, interspersed with patches of peppergrass and crested wheatgrass. Wild mustard, needlegrass, thistle, and sunflower are present in select locations (C1519). There is a small patch of cottonwood near a small reservoir used as a stock pond and willow trees near C1522. Soils are generally silty sand with gravel in some areas.

The natural setting is dominated by the ridges and basalt outcrops of the Danskin Mountains, which border the north edge of the trail's viewshed in AU2. Several additional prominent geologic features are also within the area. Bennett Mountain is visible to the east and southeast. Inscription Rock (C1522), within the immediate setting, is a granitic outcrop likely related to the Idaho Batholith near Bowns Creek. Teapot Dome (near C1516) features a columnar basalt formation on its steep southwest-facing hillside. From C1519, Lockman Butte is visible to the southwest. Additional unnamed boulders and outcrops are present on the surrounding hills. The Owyhee Mountain Range is within the distant viewshed to the southwest, as is a possible former shield volcano (visible from C1519). Water features within the natural setting include Alkali Springs (C1516), Ditto Creek (C1520), and Hot Springs near Teapot Dome (C1517).

5.3.2.5 Other Landscape Elements

Most landscape elements that support the trail in AU2 are discussed in the scenic, historic, recreation, and natural settings. Three Island Crossing State Park and the associated viewpoint on the south bank of the Snake River offer camping, picnic areas, and an interpretive center that support the nature and purpose of the Oregon NHT. The town of Glenns Ferry and the community of Mayfield are the only population centers within 5 miles of the Oregon NHT, although Glenns Ferry was historically associated with the Oregon NHT route. The outskirts of Hammett, Mountain Home, and Kuna are located off I-84 just south of the trail's 5-mile distance zone and are visible in the distant viewshed but do not detract from the trail's resources qualities, values, and settings.

Many of the roads near the Oregon NHT in AU2, primarily county roads, are associated with the Main Oregon Trail Backcountry Byway and provide trail-related recreation opportunities for interpretation and vicarious experiences. In some areas, however, these roads obscure the trail. Additional landscape elements associated with the Backcountry Byway include interpretive signs and hiking trails.

Multiple intersecting transmission lines, including steel lattice and wood H-frame towers, are within close proximity to the trail in all directions and greatly diminish the overall setting. Several wind farms are located within the southeast portion of the AU and are visible from most IOPs within AU2. Additional landscape elements include a communications tower facility to the northwest and a dump near IOP C1522. Land ownership in this AU is scattered with short trail segments on BLM-managed land interspersed with private property. Agricultural activity is limited in this area, with some agricultural fields visible in the distant valley floor.

5.3.3 Inventory Results AU3

5.3.3.1 Visual Resources

AU3 includes the Oregon NHT South Alternate, which contains the C.J. Strike HPHS. Table 12 lists the field and remote IOPs analyzed for the VRI within this AU.

Table 12. Analysis Unit 3 – Inventory Observation Points

IOP	IOP Description
C113	Oregon NHT South Alternate
C137	Simulation Point
C1133	Recreation View
C1155	Recreation View
C1501	C.J. Strike Ruts (HPHS)
C1502	Cove Recreation Site at CJ Strike Reservoir
C1508	Oregon NHT Crossing-Route 9D
C1526	North Side of CJ Strike Reservoir
C1529	Three Island Crossing and Two Island Crossing Viewpoint[1/]

1/ Inventory Observation Point (IOP) C1529 is on state lands. Due to its location on state lands, this IOP was not analyzed for impacts consistent with BLM Manual 6280. This IOP was chosen as an inventory point to assess scenic quality in this AU.

Scenic Quality Rating Units

This segment of the Oregon NHT South Alternate is within a Class A scenic area. AU3 is characterized by the bold landform created by the Snake River Canyon that includes a striking combination of high cliffs and rolling hills that lead to the river. The vivid color from the C.J. Strike Reservoir and Snake River contrasts with the dry monotone landscape of the adjacent Bruneau Dunes and surrounding area. Vegetation is limited to sagebrush and cheatgrass with some agricultural development throughout the area. The Danskin Mountains to the north moderately enhance the overall visual quality but do not dominate the scenery. In AU2, there are cultural modifications favorable to and discordant with the visual harmony. The C.J. Strike Hydroelectric Project has created the multi-armed reservoir, which provides multiple scenic and recreation opportunities within the region, while transmission lines that parallel the trail along the north side of the reservoir are discordant within the visual landscape.

Sensitivity Level Rating Units

The entirety of AU3 is rated as highly sensitive, due to the Congressional designation for this segment of the Oregon NHT, as well as its inclusion of the Hagerman Fossil Beds HPRSEG and the C.J. Strike Ruts HPHS.

Distance Zones

The viewsheds along the Oregon NHT within AU3 have few visual obstructions within the foreground/middleground and background distance zones. Travel route viewers along I-84/US 26/US 30 and Idaho State Highway 78 will pass through the foreground/middleground and background. Seldom seen areas include portions of the Snake River north of the C.J. Strike Reservoir, the Sailor Creek Basin, and the north end of the Bruneau Canyon.

5.3.3.2 Cultural/Historical Resources

AU3 follows the Oregon NHT South Alternate Route. At Three Island Crossing, approximately half of the emigrants were unable to cross the river and were forced to use the 126-mile South Alternate Route or "Dry Route." Days of hot and dusty travel along the south bank of the Snake awaited emigrants before they could rejoin the main route just west of Fort Boise (NPS 1998). The route was far less desirable than the preferred North Route. In 1843, Overton Johnson and William H. Winter, among the first emigrants to traverse the South Alternate, noted that the trail passed, through "perhaps the most rugged, desert, and dreary country between the Western borders of the United States and the Shores of the Pacific. It is nothing else than a wild, rocky barren wilderness, of wrecked and ruined Nature, a vast field of volcanic desolation" (Idaho State Historical Society Reference Series 1968).

In AU3, the trail closely follows the Snake River's south bank between the towns of Glenns Ferry and Grand View. The trail is accompanied by braided sections of non-Oregon NHT trail, which are largely located north of the C.J. Strike Reservoir. The historic setting is characterized by striking views of the river and the C.J. Strike Reservoir, located next to the C.J. Strike Ruts HPHS. Beginning in the east, additional prominent geographic features include Deadman Canyon, the Bruneau Dunes—located 1 mile south of the trail—and the Waterhouse Gulch. The largely flat area within this AU is defined by these geographic features, with the C.J. Strike Reservoir being the most prominent visual element in the landscape.

Several segments of the trail are visible; however, many have been obliterated by modern developments and agriculture. Agriculture and grazing have had minor impacts on the historic setting, such as trail erosion and minor visual impacts related to agricultural properties. The greatest cultural modification to the area's historic landscape is the damming of the Snake River for the C.J. Strike Reservoir. Transmission lines are also present within this AU, including a 138-kv line that crosses directly over the reservoir's main basin. These cultural modifications are present in the viewshed and modify the historic setting.

Though the reservoir itself would not have existed during the time that emigrants were using the Oregon NHT, there are clearly defined trail ruts located southeast of the reservoir that provide interpretation for the area. The Snake River would have been the dominant physical feature within the historic setting. Thus, the present emphasis on large water bodies as a cultural modification does not significantly detract from the cultural setting, except where the damming of the reservoir has physically obscured sections of the trail.

The C.J. Strike Ruts are the only HPHS in AU3, and there are no HPRSEGs. One previously recorded historic site associated with the Oregon NHT in AU3 was identified in the Cultural Resources study (Table 13).

Table 13. Previously Recorded Historic Sites Associated with the Oregon NHT in AU3

Site No.	Site Class	Site Type	Description	NRHP Recommendation
10OE6025	Historic	Historic Road	Segment of the Oregon NHT (South Alternate)	Non-contributing

Emigrant diary entries describe the general setting of the South Alternate), as well as the approach to the Bruneau River.

South Alternate Route

In 1848, traveling with the Miller Company, William Anderson described the difficult terrain experienced on the South Alternate route after the company's decision to not cross the Snake River at Three Island Crossing. Anderson described the day's 10-mile journey west from the crossing:

> *July the 29th we concluded that we would not cross the river and so the foremost company* [Gates] *roled out and we followed and traveled 8 miles down on the left bank of the river our road to day was pretty bad there several places that there was barely room for our waggons to pass between the river and the bluffs and they were very rocky and sidelong some waggons came verry near to upsetting and roling some 40 or 50 feet into the river we pased several small patches of grass to day* (La Salle 2011).

On the following day, July 30, 1848, William Anderson describes the ongoing journey west from Glenns Ferry:

> *When we came to where the road left the river and not knowing how far it would be before we would come to watter agan we concluded to camp here (here a blacksmith who had said all the way he would take his tools through had to give it up and buried them with the intention of coming back the next season after them) our road to day was pretty good with the exception of one mile where the mountains closed into the river this was verry rocky and sidelong the company before us* [Gates] *broke an axletree and were compeled to leave the waggon* (La Salle 2011).

In July 1848, Riley Root joined the Gates Company at Three Island Crossing after departing from the Wambaugh Company he had traveled with (La Salle 2011). Root writes about the difficult road from Glenns Ferry along the Snake River's south bank on July 29, 1848 (approximately 14 miles west of Glenns Ferry, just north of Highway 78): "12 miles over as rough and stony a road, along the banks of the Snake river, as I ever traveled. One wagon was broken, to-day, and left to be totally destroyd [sic] by those that came after us" (La Salle 2011).

On July 30, 1848, Riley Root describes the grassy river islands his company saw as they travelled along the Snake River's south bank (approximately 14-25 miles west of Glenns Ferry): "Grass not very good. About two miles back, grass might be had by driving the cattle on to an island, in the river. Road sandy during forepart of the route, to-day, and during the afterpart, good" (La Salle 2011).

Approach to Bruneau River

During the overland migration, the Bruneau River (now part of C.J. Strike Reservoir Bruneau Arm) was known as Catherine Creek and Salt Grass Creek. Emigrants described the journey along the South Alternate to the Bruneau River as hot, dusty, and sandy. In 1852, John Kerns noted, "Road as usual, very dusty, and country a barren, deserted, burnt-to-death waste" (Rau 2001). Riley Root and the Gates Company

reached the Bruneau River on July 31, 1848. Root described the area's salt grass and the bluffs on approach to the Snake River:

> *11 ½ miles. Six and a half miles to Salt Grass creek, a name given from the abundance of salt grass growing there. A tolerable camp might be had at that place. The creek soon passes among the bluffs, in a northerly direction, and unites with the Snake river, about 5 miles below where we campd. Grass is plenty at this place, but it is almost impossible to obtain anything of which to make fires* (La Salle 2011).

William Anderson and Miller Company reached the Bruneau River soon after Root and the Gates Company. Anderson wrote:

> *July the 31st we traveled 14 miles we traveled up a long sand hill and 4 miles from where we left camp we came down into the river bottom agan here was pretty smart grass we traveled a long in this bottom 2 miles and agan left the river and ascended a long hill 8 miles from this bottom we came to a creek, the name of which none of the company knew nor none of the maps or journals that we had gave it any name so I gave it the name of Moss creek* [Bruneau River] *there being a great deal of moss in the bottom of it this was a good camp* (La Salle 2011).

Table 14 describes the resources, qualities, and values of the Oregon NHT observed from selective IOPs in AU3.

Table 14. IOP Descriptions of Oregon NHT Resources, Qualities, and Values in AU3

IOP	Character-Defining Features
C113	Swale running east-west, measures 12–15 feet wide and 12–16 inches deep. Marked with Carsonite posts. No artifacts noted.
C120	Shallow swale 12–15 feet, runs east-west at base of hill. Numerous Carsonite markers. Two-track access road to C.J. Strike Reservoir cuts across trail and has removed about 40 m of the trail. No period artifacts noted.
C137	A deep swale 15–17 feet wide and up to 12 inches deep is present. A second, shallow swale is on the south side, running parallel to the deep swale. The shallow swale is 10 feet wide and about 9 inches deep at center. The trail is marked with Carsonite posts and runs east-west.
C1133	Bladed gravel road. No visible evidence of original trail. One Carsonite marker on gravel road. Gravel road is called "Oregon Trail Road."
C1501	At least five parallel swales, including two deep swales that converge. Three or more shallow swales occur on the northeast side of deep swales. Swales range from 10–15 feet wide. The deep swales are about 3 feet deep at center. The shallow swales measure up to 12 inches deep. Runs northwest-southeast at this point. Noted an aqua glass insulator fragment, suggesting telegraph line was once here.
C1502	Two parallel swales visible starting at barbed wire fence and transmission line on hilltop. Trails/swales go northwest and downhill toward reservoir. An active HOV trail meets the swales and goes down one of them.
C1508	A 60-meter segment of swale measures 12 feet wide and up to 12 inches deep at center. Modern debris from roadside dumping occurs along the access road and Oregon Trail. The trail runs generally east-west.
C1526	Trail appears as a shallow swale/two-track and ends at a Carsonite marker, where it was removed by a wide, mechanical blade swath. Oregon Trail is 12–14 feet wide. Bladed swath is about 17 feet wide. Noted fragment of aqua-colored bottle glass.
C1155	Area has wide, shallow rut running parallel to the north edge of Highway 78. It is 15 feet wide and located about 10 meters north of the highway. A 9-foot-wide two-track runs parallel to the swale's north side. Carsonite markers have been placed on the two-track.

5.3.3.3 Recreation and Travel Opportunities

The only BLM-managed recreation site within AU3 is the Cove Recreation Site at the C.J. Strike Reservoir (IOP C1502). This recreational opportunity provides striking views of the reservoir and Snake River as well as ample Oregon NHT interpretation through surviving ruts marked by BLM Carsonite trail markers.

The NPS ATR (NHT^3) parallels the South Alternate of the Oregon NHT for the majority of this AU, facilitating access to significant viewing points along the trail. These include the C.J. Strike Ruts (IOP C1501), a viewpoint along the Snake River (IOP C120), viewpoints on the north side of the C.J. Strike Reservoir adjacent to associated trail segments (NHT^2) (IOPs C1526 and C137), and a point where the auto route joins the North Trail (IOP C113).

An additional BLM-managed recreation site is the Indian Bathtub Recreation Site, which is over 8 miles south of the trail and was established as a recreation site in 1891 near Bruneau Hot Springs (ISHS 1995). Recreational opportunities at this site may or may not be related to the trail.

Other recreational opportunities in the area consist of extensive dispersed OHV and Jeep trails, averaging 5-10 miles from the trail at the foothills of the Owyhee Mountains. In addition, some dispersed camping and fishing occurs within large patches of BLM-managed land that is divided by segments of private land and is considered discontinuous.

5.3.3.4 Natural Resources

The vegetation in AU3 is primarily disturbed grassland and areas of shrub-steppe with sparse big sage and rabbitbrush. Cheat grass is the predominant groundcover, mixed with needlegrass and tower mustard in some areas. Soil types include sandy loam, silty sand, and sandy silt with scattered gravel and some small boulders in select locations.

A combination of geologic features creates the natural setting within AU3. Portions of the upper rim of the north and northeast wall of the Snake River Canyon are visible, illustrating the region's basic stratigraphy and delineating the river's presence and location within the natural setting. The C.J. Strike Reservoir, though not historic, provides some variation within the viewshed. The view northward across the reservoir includes dark, basalt-capped plateaus with contrasting light colored rhyolite underneath (C120). Other geologic formations include Flat Iron Butte, the Owyhee Mountains to the west, and low bluffs and rock outcroppings of basalt bedrock to the north and northeast.

5.3.3.5 Other Landscape Elements

Landscape elements that support the trail in AU3 include Idaho State Highway 78, the main transportation corridor along the south side of the Snake River, and C.J. Strike Reservoir. Although both of these elements detract from the Oregon NHT's resources, qualities, values, and settings by obscuring the trail in areas, they also provide recreation opportunities for interpretation and vicarious experiences. Idaho State Highway 78 serves as an alternate route ("Segment B") of the NPS ATR, and portions of the Oregon NHT retain visible ruts that are publically accessible in recreation areas near C.J. Strike Reservoir. Bruneau Dunes State Park is south of the Oregon NHT

along Idaho State Highway 78 and is minimally developed, causing no diminishment of the Oregon NHT resources, qualities, values, and settings.

The towns of Glenns Ferry, Hammett, and Bruneau are within 5 miles of the Oregon NHT but do not detract from the trail's resources, qualities, values, and settings. Other transportation elements near the trail include Highway 51, Crane Falls Road, Tendall Road, and several other paved and gravel county and private roads that provide access to communities, agricultural lands, and the reservoir. Tendall Road and a paralleling H-frame transmission line follow the Oregon NHT north of the C.J. Strike Reservoir Bruneau Arm and diminish the historic setting along this stretch of trail. The trail is diminished by other H-frame transmission lines that cross the Oregon NHT or are in the foreground/middleground within this AU.

Land in AU3 includes large segments of both BLM-managed land and private property. Agricultural development is evident with center pivot farming and other agricultural fields adjacent to and covering the Oregon NHT.

5.3.4 Inventory Results AU4

5.3.4.1 Visual Resources

AU4 includes the Oregon NHT South Alternate as well as the Sinker Creek HPRSEG and Utter Massacre HPHS Segment toward the west end of the Study Area. For the purposes of the VRI, the AU is composed of two sub-units, delineated by developed agricultural land (4a) and undeveloped rural land (4b). Table 15 lists the field and remote IOPs analyzed for the VRI within AU4.

Table 15. Analysis Unit 4 – Inventory Observation Points

IOP	IOP Description
C90	Oregon NHT South Alternate (SRBOP)
C91	Oregon NHT South Alternate Sinker Creek Butte Area
C132	Simulation Point
C1505	Oregon NHT Crossing-Segment 8
C1506	Oregon NHT Crossing-Route 9D
C1507	Oregon NHT Crossing-Route 9G
C1514	Oregon NHT Crossing-Segment 9
C1523	Oregon NHT Castle Butte Landmark
C1524	Wild Horse Butte
C1527	Sinker Creek HPRSEG near Sinker Creek Butte
C1528	Utter Massacre Site (HPHS)

Scenic Quality Rating Units

This segment of the trail passes mostly through Class A (AU4b) and Class B (AU4a) scenic areas. The majority of the AU4 (AU4b) is characterized by the repeating vertical nature and contrasting brown, black, orange, and yellow hues of several distinct and prominent buttes. The cluster of these landforms is unique within the region and is a defining feature of AU4 and the Oregon NHT experience. Vegetation mostly consists of a limited variety of sagebrush and grassland, interspersed with less dominant species. Water is not a dominant component of the landscape in AU4. Small creeks, including Sinker Creek and Rabbit Creek, were part of the Oregon NHT emigrant experience but

are not dominant expressions in the landscape. The snow-capped peaks of the Owyhee Mountains and Silver City Range visible within the adjacent scenery greatly enhance AU4's visual quality. Idaho State Highway 78 and the small towns of Murphy and Grand View are visible from portions of the trail but do not detract from the scenic quality. Limited additional cultural modifications are neutral and add little or no visual variety to the landscape.

The dense agricultural area in AU4a is predominantly flat river valley, with the primary variations in the landscape occurring through different agricultural crops. Due to the changing nature of agricultural activity, the vegetation and color within 4a varies throughout the year. Within AU4a, I-84/US 26 primarily follows the route of the Oregon NHT and diminishes the trail's visual experience caused by this cultural modification.

Sensitivity Level Rating Units

The entirety of AU4 is rated as highly sensitive, due to the Congressional designation and associated protection measures for the Oregon NHT South Alternate and its constituent parts, which include the Sinker Creek HPRSEG and Utter Massacre HPHS. The Utter Massacre HPHS is not located on BLM-managed land.

Distance Zones

AU4 includes viewsheds from the trail within the foreground-middleground (up to 5 miles), and background (5-15 miles) distance zones, as well as seldom seen areas. To the north, west, and southwest, the viewshed from this AU (4a and 4b) is primarily limited to the foreground/middleground, while the viewshed in the south and east is largely open, with some seldom seen areas in creek basins, and in a wide valley north of Grand View. Travel route viewers along Idaho State Highway 78 will pass through the foreground/middleground in this AU (4a and 4b).

5.3.4.2 Cultural/Historical Resources

In AU4, the Oregon NHT South Alternate route closely follows the Snake River's south bank, except where the route diverges to the east towards the town of Murphy. The historic setting is characterized by a series of prominent buttes and dividing creeks. Beginning in the east, buttes include Black Butte, Jackass Butte, Wild Horse Butte, Fossil Butte, Sinker Creek Butte, Sinker Butte, and Guffey Butte. Primary creeks include Catherine Creek, Castle Creek, Sinker Creek, and Scorpion Creek.

The route in AU4 encompasses the Sinker Creek HPRSEG and is followed by several small sections of braided, non-Oregon NHT segments of trail. The HPRSEG is located between Fossil Creek and Scorpion Creek and includes the divergence towards Murphy. On August 14, 1852, John Kerns wrote that they had traveled "over a dusty road in hot weather, through the poorest of all countries" (Rau 2001). According to the NPS CMUP:

> *This segment crosses one of the driest, hottest, and dustiest stretches of the entire Oregon Trail. Emigrants who were forced to travel the South Alternate Route compared their appearance at the end of each day to a man who had been dipped into a flour barrel. The segment begins two miles northwest of Castle Butte and ends about four miles north of present-day Murphy, Idaho. The trail crosses the broken and arid mesas that stretch along the south bank of the*

> *Snake River, passing Wild Horse Butte, crossing Sinker Creek, and climbing Sinker Creek Butte* (NPS 1998).

AU4 also contains two HPHSs: the Utter Massacre Site and Givens Hot Springs. The Utter Massacre Site HPHS is located near the AU's eastern boundary primarily on private lands. According to the NPS CUMP:

> *A major emigrant campsite was located on the South Alternate Oregon Trail at Henderson Flats near Castle Butte. On September 9, 1860, the Elijah Utter party of 44 emigrants was attacked by Indians. During the two-day siege, 11 people were killed. Seventeen others managed to escape but subsequently died or were killed. Only 16 emigrants survived the attack and the hardships that followed. This was one of the rare occasions when Indians sustained a prolonged assault on encircled emigrant wagons. The exact site of this battle has not been located* (NPS 1998).

An interpretive sign describing the Utter Massacre (C1528) is situated on a small tract of BLM-managed land off Highway 78, but the significant components of this event took place in several locations within the surrounding area.[1]

The Givens Hot Springs HPHS is located at the western end of AU4 and includes a series of hot springs that bubble up from a flat near the Snake River's south bank. On August 4, 1848, Riley Root and Gates Company arrived at Givens Hot Springs. Root wrote: "The water of these Hot springs, at their source, is scalding hot" (La Salle 2011). The area surrounding the natural hot springs was a popular campground for both emigrants and American Indians and has since been developed into a privately run modern recreation site for picnics, camping, and RV use (NPS 1998). The site is no longer physically connected to the trail as it is located off Highway 78, and its viewshed has been greatly altered through cultural modification.

No historic or cultural sites associated with the Oregon NHT in AU4 were identified in the Cultural Resources study.

Emigrant diary entries describe the segments general conditions, illustrating how, from the Bruneau River area, the trail continued along the Snake River through today's Grand View, to Castle Creek and Castle Butte, then past Wild Horse Butte and on to Sinker Creek and Givens Hot Springs.

Journey to Castle Creek

Castle Creek is named to describe some of the singular looking rocks along the creek, which have "the appearance of old dilapidated castles and other ruins" (Hutchison and Jones 1993). William Anderson of Miller Company wrote in his diary on August 1, 1848: "Left Bruneau River on August 1 and traveled 15 miles." The camp that night would have been 3 miles northwest of Grand View, Idaho, and 1 mile north of Highway 78. On August 2, Anderson and Miller Company traveled 12 miles; Anderson noted that "our road to day was verry dusty sage plain." Then, "10 miles brought us to a small branch [Castle Creek] here was a pretty good camp but we passed on 2 miles further to the

[1] The GIS shapefile point for this site received from the BLM shows the site as being on private lands, but since the site has not been mapped, there may be some Utter Massacre related resources or sites located on BLM-managed land that have not been identified.

river where we had a poor camp we drove the cattle 1 mile down the river to a small patch of grass" (La Salle 2011).

Henry M. Judson wrote on September 4, 1862: "About 12 o'clk we reach Castle Creek so called from some singular looking rocks having the appearance of old dilapidated castles and other ruins- soon Capt K's [Kennedy] train arrives and Corrals near us- After remaining an hour & a half we are ordered to hitch up & drive on a mile or so for better grass ... we comply & find grass higher than our heads & just abreast of the Castle rock- on the other side of the corral runs the creek a small crooked stream" (Hutchison and Jones 1993).

Journey to Camp near Castle Butte

On August 1, 1848, Riley Root and Gates Company left camp near the Bruneau River mouth, traveling as close as possible to the Snake River. The group's general direction began to change from westerly to northwesterly, and Root described arriving at Castle Creek (which crosses Highway 78 approximately 11 miles northwest of Grand View) and the geological formation now known as Castle Butte:

> *August 1st- 19 ½ miles, over a very level plain, most of the way, and near to the river, to camp, on Grease Wood [Castle] creek, about a mile above its mouth. No good camp can be had along this day's route, till our present one, which is not very good. Between camp and Snake river, the little stream [Castle Creek] in which our camp is located passes through two crags of basaltic rock, much crumbled down by time. Rock, east of creek, shows marks of excessive volcanic violence. Volcanic cinders, rocks half melted, chimneys where smoke had issued, and in fact, every mark of Vulcan's blacksmith shop is here displayd* (La Salle 2011).

Castle Creek to Sinker Creek (Burnt Rock Creek)

On August 3, 1848, William Anderson and Miller Company traveled 7 miles from their camp to arrive at Sinker Creek, "a spring branch." Their campsite was about 9 miles southeast of Murphy, Idaho. According to Anderson, "we drove our stock ¾ of a mile down this branch to the river for grass." "[I]n going down this branch to the river we pass through a narrow canyon the sides of which were 500 feet high 200 feet perpendicular." Anderson noted "a volcanic appearance burnt rock lay scattered around for miles up and down the river and hills in every shape and form" (La Salle 2011).

Evan S. McComas wrote on September 5, 1862: "Started from Castle Creek, drove 7 m. to Burnt Rock Creek [Sinker Creek]. Here had no grass at all. Here we watered and rested our cattle and prospected for gold. Found from five to fifteen grains or colors of gold in each pan. Here we had to climb the worst hill on the Oregon road. Doubled teams and got up by four o'clock" (Hutchison and Jones 1993).

John Tucker Scott, who journeyed through the Sinker Creek area in 1852, described his impressions on August 13: "country all around is extremely barren interspersed with deep kanyons & high rocky bluffs all blackened ... doubtless volcanic formation" (Rau 2001; see Figures 3 and 4).

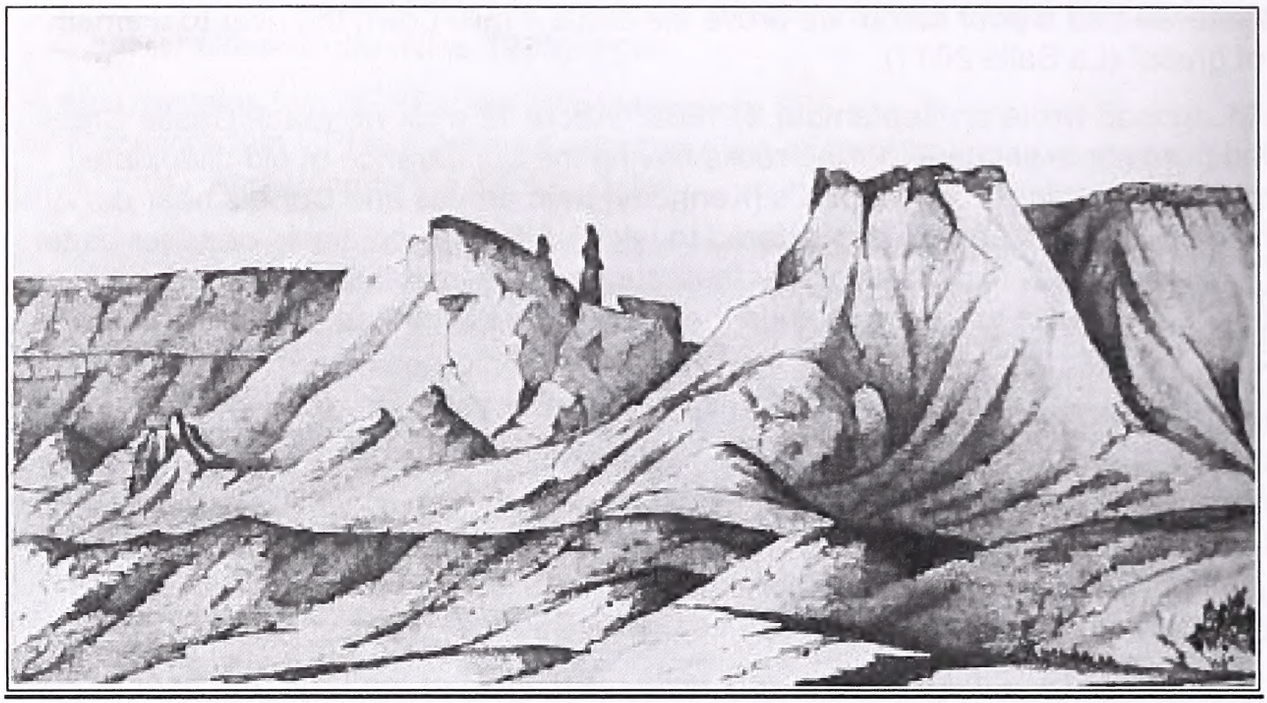

Figure 3. Snake River Bluffs, Drawing (circa 1849), William Henry Tappan, 1821-1907 (Hill 2001)

Figure 4. Snake River Bluffs in the Distance, View Facing Northeast (Patience Stuart, photographer, AECOM, 2015)

Table 16 describes the resources, qualities, and values of the Oregon NHT observed from selective IOPs in AU4.

Table 16. IOP Descriptions of Oregon NHT Resources, Qualities, and Values in AU4

IOP	Character-Defining Features
C90	5-foot wide and 3–4 inch deep swale present with obvious two-track ruts. Use seems to be more for OHV than truck.
C91	A 10 to 12-foot wide swale is visible, running east-west. The swale is up to 10 feet deep. A second, shallow swale runs parallel to the south side of the deeper swale. The second swale is about 10 feet wide and about 6 inches deep. The swales are only visible on BLM-managed land, west of a gravel access road. No period artifacts observed. The trail is marked with Carsonite posts on BLM-managed land.
C132	There is a 5-foot wide, 3-inch deep swale, and two-track ruts.
C1505	The trail route is very diffuse, with considerable erosion on the slopes leading into the drainage.
C1506	The swale is approximately 6 inches deep. The trail is somewhat obscured in places by sagebrush. The width is no more than 5–6 feet, but appears more characteristic of an animal trail because of use by cattle. No associated artifacts observed.
C1507	Grassy flat that was previously at the bottom of the reservoir. No evidence of the trail at this location due to extensive erosion.
C1514	A subtle swale measures 3 inches deep. The trail is approximately 6 feet wide, with some braiding. No associated artifacts observed.
C1523	A shallow swale contains a well-defined two-track road. The road is still being used to access the BLM-managed land. It measures 12 feet wide and about 6 inches deep. No signs mark the trail. The trail runs east-west at this location. It should turn north toward Castle Butte on private hunting club property. No artifacts observed.
C1524	A two-track road is within a shallow swale in places. It measures 10 feet wide and is marked with Carsonite posts.
C1527	At least two swales marked with Carsonite posts. The swales at this point are about 8 feet wide and up to 10 inches deep. The two-track road is within a swale that is about 10 feet wide. No artifacts found.
C1528	The Utter Massacre interpretive sign is located on BLM-managed land off Highway 78, a paved, two-lane road. The roadside sign here describes the Indian assault on the Utter wagon train in September 1860. The trail is located north of this point. No artifacts were noted.

Agriculture and grazing have greatly impacted the historic setting, causing erosion, decimation of trail ruts, and major visual impacts related to agricultural properties, particularly within AU4a. Within AU4b, agriculture is dispersed and has less of an impact on the overall historic setting of the trail. Murphy is a very small town with a population of less than 100 people. The only prominent visual feature within the town's landscape that can be seen from the trail is a mid-century water tower. The remainder of the area within this AU is sparsely populated, except for the area within AU4a, which is a large area covered with agricultural fields located at the far northwestern edge of the APAI. Nearly all of AU4a is located within fully developed agricultural plots and smaller housing developments. Additional cultural modifications to the historic setting include extensive transmission lines to the north and east and three wind farms located east of Murphy.

5.3.4.3 Recreation and Travel Opportunities

There are 19 BLM-managed recreation sites located with AU4 that may or may not be related to the Oregon NHT but appear to be largely connected to off-road OHV recreation (Table 17). Other recreational opportunities in the area consist of extensive dispersed OHV and Jeep trails, averaging 5-10 miles distance from the trail at the foothills of the Owyhee Mountains. In addition, some dispersed camping and fishing occurs within large patches of BLM-managed land that is divided by segments of private land and is considered discontinuous.

Table 17. BLM Recreation Sites within AU4

Site Name	Distance from Trail	Primary Use
McKeeth-Vinson Wash Off-Highway Vehicle (OHV) Recreation Site	5 miles from South Alternate	OHV Off-Road Recreation
Birch Creek Bench OHV Recreation Site	5 miles from South Alternate	OHV Off-Road Recreation
Sinker Creek Rim OHV Recreation Site	7.5 miles from South Alternate	OHV Off-Road Recreation
Rabbit Creek OHV Trailhead Recreation Site	1 mile from South Alternate	OHV Off-Road Recreation
South Rabbit Creek OHV Recreation Site	3.3 miles from South Alternate	OHV Off-Road Recreation
Murphy Y Dispersed Recreation Site	1.6 miles from South Alternate	OHV Off-Road Recreation
Hemingway Butte OHV Trailhead Recreation Site	1.8 miles from South Alternate	OHV Off-Road Recreation
Fossil Creek OHV Trailhead Recreation Site	5.3 miles from the South Alternate	OHV Off-Road Recreation
Diamond Basin Well OHV Recreation Site	7 miles from the South Alternate	OHV Off-Road Recreation
Priest Dunes OHV Play Area	3.8 miles from the South Alternate	OHV Off-Road Recreation
Kuna Butte Dispersed Recreation Site	12 miles from South Alternate 20 miles from North Alternate	National Conservation Area (NCA) Interpretive site
Three Pole Recreation Site	4 miles from South Alternate 25 miles from North Alternate	NCA Interpretive site
Kuna Cave Recreation Site	9 miles from South Alternate 20 miles from North Alternate	NCA Interpretive site and Natural Feature
Initial Point	9 miles from South Alternate 20 miles from North Alternate	NCA Interpretive Site
Higby Cave Recreation Site	15 miles from South Alternate 14 miles from North Alternate	NCA Interpretive site and Natural Feature
Cabin Draw Recreation Site	2.2 miles from South Alternate	Fishing and Snake River Access
Wilson Creek Trailhead Recreation Site	4 miles from South Alternate	Hiking Trail and Natural Area
Wilson Creek Wayside Recreation Site	2.3 miles from the South Alternate	Wayside
Diamond Creek Campground	11.2 miles from the South Alternate	Hunting and Dispersed Camping

5.3.4.4 Natural Resources

The ground surface in AU4 is mostly covered with shrub-steppe and disturbed grassland vegetation. Cheatgrass is the most common groundcover and generally dominates the understory. Other plants, such as apricot mallow, towering mustard, and other flowering plants are present in more localized areas. Medium-density sagebrush and bitterbrush, with some rabbitbrush, comprises the overstory. Soils in this AU are silt and vary from coarse to fine-grained sand with scattered areas of gravel.

The natural setting in AU4 is defined by a series of rocky buttes, including (from east to west) Black Butte, Jackass Butte, Castle Butte, Wild Horse Butte, Fossil Butte, Sinker Creek Butte, Sinker Butte, and Guffey Butte. These buttes create a unique concentration of geologic formations within the natural setting. Wild Horse Butte, for example, includes a flat-topped circular butte about 1 mile in diameter that rises approximately 300 feet from the surrounding landscape. From observation areas within the AU, the butte clearly shows a veneer of dark-colored basalt overlying lighter-colored rhyolite.

Other geologic features include the Snake River Canyon, Striker Basin Gulch, Henderson Flats, and other unnamed basalt bluffs and flows. In the distant viewshed, the cliffs of Murphy Rim are visible to the east, and the Owyhee Mountains are visible to the south and southwest. In addition to the river, some drainage features are within the AU, including Rabbit Creek (C132), Castle Creek, and Fossil Creek.

5.3.4.5 Other Landscape Elements

Landscape elements that support the nature and purpose of the Oregon NHT in AU4 are limited to Idaho State Highway 78, the NPS ATR "Segment B," which follows the South Alternate of the Oregon NHT, and interpretive resources associated with this route. The highway's location and traffic diminish aspects of the trail's resources, qualities, values, and settings, but also provide recreational opportunities for interpretation and vicarious experiences. Other transportation elements near the trail include Con Shea Road, Murphy Flat Road, Warrick Road, Rye Patch Road, and localized OHV routes.

The town of Murphy and the communities of Walters Ferry, Guffey, and Wilson are within 5 miles of the Oregon NHT. The townscape and multiple buildings in Murphy are visible from some IOPs in AU4, causing a slight visual intrusion to the historic setting from nearby IOPs. Land ownership in this AU is composed of large segments of both BLM and private property. Agricultural activity in the AU has introduced farmsteads, irrigated alfalfa and other fields, and fences into the setting. Canyon County, which encompasses the northwest end and concentrated agricultural area of the AU (4a) is the highest producer of corn in the state and grows the majority of Idaho's orchard, seed, and mint crops.

Some existing transmission lines are present within the viewshed to the southeast, east, northeast, and north of the Oregon NHT. Additional landscape elements include a collapsed earthen dam near the Oregon NHT (C1507) and a U.S. Department of Ecology hazardous waste landfill site (near C1523).

5.3.5 Inventory Results AU5

5.3.5.1 Visual Resources

AU5 includes the entirety of the North Alternate Study Trail. Table 18 lists the field IOPs analyzed for the VRI within this AU. For the purposes of this study, other Federal Protection Components of the Oregon NHT situated in AU5, such as the Three Island Crossing HPHS, Upper Salmon Falls HPHS, and North Trail HPRSEG, are considered in AU1.

Table 18. Analysis Unit 5 – Inventory Observation Points

IOP	IOP Description
C83	Oregon NHT North Alternate Canyon Creek near Stage Station (HPHS)
C84	Oregon NHT North Alternate King Hill
C85	Oregon NHT North Alternate Pioneer Reservoir
C118	Oregon NHT North Alternate south side of Blair Trail Reservoir
C1503	Emigrant Reservoir
C1510	Oregon NHT Crossing–Route 8A
C1511	Oregon NHT Crossing–Segment 8
C1512	Oregon NHT Crossing–Segment 8
C1513	Oregon NHT Crossing–Segment 8
C1525	North Alternate Study Trail Segment between Bennett Creek and Cold Springs Creek

Scenic Quality Rating Units

The North Alternate Study Trail is within a Class C scenic area. The landscape is a combination of mostly undeveloped land with interspersed agricultural activity. The Danskin Mountains bound the north edge of the viewshed, while flat lands and gentle sloping hills are to the south. Distinct land forms are present from portions of the trail, including the Snake River canyon cliffs, rounded basalt boulders, King Hill, and Bennett Mountain ridge. The color is generally grey mixed with muted hues of brown, orange, green, and blue, providing subtle color variations and limited contrast. Small creeks, reservoirs, and seasonal streams exist in the landscape, but water is not a major defining feature of the landscape. Some variety of vegetation is present, though sagebrush and grassland are the major types.

Multiple transmission lines are visible within the landscape and introduce discordant elements to the scenic harmony. Major highways and interstates are present within the foreground/middleground, but are not adjacent to the trail and do not substantially modify the visual setting from the trail.

Sensitivity Level Rating Units

The entirety of AU5 is rated as highly sensitive, due to the inclusion of the North Alternate Study Trail in the NPS' Four Trails Feasibility Study (NPS 2011a). This study considers the feasibility of including the North Alternate Study Trail as part of the existing Oregon NHT designation.

Distance Zones

AU5 includes viewsheds from the trail within the foreground-middleground (up to 5 miles), and background (5-15 miles) distance zones, as well as seldom seen areas. The Danskin Mountains comprise the extent of the trail's viewshed to the north, while

the Sailor Creek Basin and Bruneau Desert mostly follow the trail's 15-mile viewshed to the south. Areas beyond these landforms, as well as portions of the Snake River Canyon, are in the seldom seen distance zone. Travel route viewers along I-84 and US 26, which serve as the NPS ATR through AU5, will pass through the foreground/middleground south of the trail.

5.3.5.2 Cultural/Historical Resources

In AU5, the North Alternate Study Trail clings to the southern edge of the Mount Bennett Hills and is not associated with the Snake River. This segment runs from the Salmon Falls crossing of the Snake River to Clover Creek, crossing the Malad River and traveling through Bliss, then follows the east side of Clover Creek to where the Clover Creek Stage Station would eventually be built. At this point, the Study Trail joined with Kelton Road and followed the same route to a connection with the Primary Trail North Trail near Hot Springs and Alkali Creeks (Eichhorst 2011). Many braided, non-Study Trail segments are located along the Study Trail.

The North Alternate Study Trail was used by thousands of emigrants attempting to find a better route to Oregon across the southern Idaho desert (Eichhorst 2011). Emigrants began using the North Alternate Study Trail in 1852 after retired mountain men installed a ferry above Salmon Falls (Hutchison and Jones 1993). Research suggests that between 1852 and 1854, the North Trail was the primary route traveled, with nearly two-thirds of emigrants using this route (Eichhorst 2011). According to Eichhorst's article, "Pieces to the Puzzle" (2011):

> *After receiving instructions from the ferrymen, the emigrants started on the [North Alternate Route] with no trail guide to lead them. As they followed this new route, the diarists gave names to the creeks and rivers they crossed, usually based upon the terrain encountered in the crossing. Unlike the main Oregon Trail which had published guides naming the creeks and thus allowing consistency in the diaries, the [North Alternate Route] names varied with the imagination of the writer.*

The alternate avoided a 30-mile desert crossing between Salmon Falls and the traditional ford at Three Island Crossing (Bagley 2012). The trail had good forage and springs, but at Clover Creek, which William Cornell called Grave Creek and Henry Allyn said was a "creek of poison," contaminated water proved fatal for humans and cattle. After 1854, travel shifted back to the main trail, leaving the alternate lined with graves (Bagley 2012).

The historic setting is characterized by the Bennett Hills to the north and a series of seasonal creek crossings that separate large patches of grasslands. Primary seasonal creeks include Clover Creek, King Hill Creek, Little Canyon Creek, Alkali Creek, Cold Springs Creek, and Ryegrass Creek. Pioneer Reservoir and Blair Trail Reservoir are also associated with the Oregon NHT. The creeks, reservoirs, and prominent hills to the north dominate the historic and cultural landscape.

There are no HPHSs or HPRSEGs associated with the North Alternate Study Trail. The Study Trail, by definition, is still under study in the scoping process and thus full historic documentation and survey of the area has not been completed. There may be potentially historic resources associated with the Oregon NHT located within the vicinity

of the North Alternate Study Trail that were not observed during fieldwork and that have yet to be identified.

Agriculture and grazing have had minor impacts on the historic setting, including erosion of the trail and some minor visual impacts related to agricultural properties. The greatest cultural modifications to the historic landscape in this area include extensive transmission lines surrounding the trail on both sides and directly adjacent to it and large-scale wind farms located to the south. These cultural modifications are present in the viewshed and greatly modify the historic setting.

Eight previously recorded historic sites associated with the North Alternate Study Trail were identified in the Cultural Resources study (Table 19) in AU5.

Table 19. Previously Recorded Historic and Cultural Sites Associated with the North Alternate Study Trail in AU5

Site No.	Site Class	Site Type	Description	NRHP Recommendation
10EL1918 (GW1-148)	Historic	Historic Road, Historic Debris Scatter	North Alternate Study Trail, Kelton Road	Eligible/Contributing
10EL1918 (GW1-148)	Historic	Historic Road	North Alternate Study Trail, Kelton Road	Eligible/Contributing
10EL1918 (GW1-139)	Historic	Historic Road	North Alternate Study Trail, Kelton Road	Eligible/Contributing
10GG0689 (GW1-81)	Multi-component	Historic Road, Historic Debris Scatter, Precontact Lithic Material	North Alternate Study Trail, Kelton Road	Eligible/Contributing
10GG0689 (GW1-158)	Multi-component	Historic Road, Precontact Lithic Material	North Alternate Study Trail, Kelton Road	Eligible/Contributing
10GG0689 (GW3-1)	Historic	Historic Road, Historic Debris Scatter, Precontact Lithic Material	North Alternate Study Trail, Kelton Road	Eligible/Contributing
10GG0689 (GW3-2)	Historic	Historic Road	North Alternate Study Trail, Kelton Road	Eligible/Contributing
GW1-159	Historic	Historic Road; Historic Debris Scatter	North Alternate Study Trail near Pioneer Reservoir	Eligible/Contributing

Emigrant diary entries highlight the Malad River Crossing, which included the camps at King Hill and Pioneer Reservoir, and the trade activity at Clover Creek.

Malad River Crossing and Clover Valley

Emigrants crossed the Malad River a short distance above a deep gorge where the river drops from the high desert plain to the bottom of the Snake River Canyon (Eichhorst 2011). Deep gushing water and large rocks made the crossing dangerous and often required camping out on an island in the channel. Harvey Hines began writing letters to the Wyoming County Mirror in 1853, shortly after his trip had been completed. He

describes the surrounding area after crossing the Malad River during the summer heat and the natural setting of the valleys beyond:

> *August 12, 1853: The men who went out to sleep with the oxen came in very early with them, and before seven o'clock, we forded Malad and continued westward over a country as nearly the picture of desolation one can imagine. The sun burned with a horrible fierceness. The dust enveloped us in a whitish cloud, so that frequently the driver could not see more than half his team. The heat wilted the leaves of the sage and filled the atmosphere with its sickening odor. The afternoon, especially, was a test of both patience and piety. The sunshine blazed into our faces and blistered our lips, so that it was with great pleasure that we saw the sun go down behind the west, as we entered the beautiful valley of Clover Creek, and stopped our wagons, and unyoked our oxen on its grassy banks* (Hines and Peters 2008).

> *August 13, 1853; The 13th was Saturday. We drove but about three miles when we came to a beautiful natural meadow the grass from two to six feet high, and plenty of good cool water where we encamped for our Sabbath rest. The meek-eyed oxen almost spoke their gratified surprise when, so soon after starting, we unyoked them, and let them go at their own sweet will among the natural clover tufts and the swaying red-top* (Hines and Peters 2008).

Bliss and Northward

Mae Stone describes the journey to Bliss and north to King Hill, July 19-20, 1898:

> *Wed. 19 We left the last camp in morning & went to Bliss before noon We met a young man on the road his is going to Bliss. We came through a lot of sand & up a big steep rocky, sandy hill that the horses nearly played out on us ... I am writing this in the sage brush with the camp fire for a light (we are cooking beans)...We are about 3 or 5 miles from Kingdom Hill* (Holmes 2011).

> *Thursday 20 Kingdom Hill isnt so bad as the Malad Hill & the other sandy hill but it was pretty steep ... The horses had a pretty hard time today it was so hot & so many up hills and down & so much sand* (Holmes 2011).

King Hill Vicinity

In 1853, Elizabeth J. Goltra and her family left Missouri for Oregon (University of Richmond 2015). Following the Study Trail, her journal was written as a guide to future emigrants traveling on the North Alternate Study Trail. From their camp near King Hill, Goltra describes the dusty landscape, lack of water, and water-borne illnesses experienced by their livestock on the North Alternate:

> *Friday August 12th. Lost 2 oxen belonging to our train last night and they are dying off all around us. Destruction stares us in the face. Drove 3 miles this morning and came to a dry creek, 8 miles farther is another creek. Not much feed, 6 miles more and we came to a creek with very good feed. Camped here. Drove 18 miles.* (University of Richmond 2015)

Clover Creek

Goltra describes the trade activity with Indian tribes and the natural setting leading up to their camp at Clover Creek (just north of Clover Creek Road approximately 7.5 miles north of Bliss):

> *Wednesday the [August] 10th. A few Indians about our camp this morning trading moccasins etc. for shirts, powder and balls. Drove 13 miles without water, came to another creek, where we camped again. Oh! we are getting so tired of this business. Found very good grass.* (University of Richmond 2015)

Table 20 describes the resources, qualities, and values of the North Alternate Study Trail observed from selective IOPs in AU5.

Table 20. IOP Descriptions of the North Alternate Study Trail Resources, Qualities, and Values in AU5

IOP	Character-Defining Features
C83	Rutted trails running east-west. Marked with OCTA Carsonite posts. No artifacts noted.
C84	Two-track road, 10 feet wide and heavily used by local farmers. OCTA Carsonite marker on road. No period artifacts noted.
C85	Trail is a deep rut with a raised berm alongside. The berm has a two-track trail on top that is no longer used. The rut is about 15 feet wide and 12 inches deep. The berm is about 30 feet wide and more than 12 inches tall.
C118	A single rut or swale about 10–12 feet wide and 9 inches deep. Marked with white Carsonite posts. No period artifacts observed. Runs east-west. OCTA markers present.
C1503	Class 2 two-track road still in use.
C1510	Wide rut running in a straight line northeast-southwest. Covered with fairly dense sagebrush and marked with an old Carsonite post. Some rusted tin can scraps noted on the trail.
C1511	Deep ruts on steep slope marked with white Carsonite OCTA posts.
C1512	Trail evident by vegetation changes.
C1513	Parallel ruts in bedrock possibly from wagon wheels. Cow trails may follow old trail.
C1525	Multiple, braided trails. Up to four parallel trails, some rutted. One main trail still in use as a two-track road. One Carsonite marker on the trail at barbed wire fence and Ross Road. No period artifacts noted.

5.3.5.3 Recreation and Travel Opportunities

There are two BLM recreation sites located within AU5 that are in close proximity to the North Alternate Study Trail: Emigrant Reservoir (IOP C1503) and Blair Trail Reservoir (IOP C118). The North Alternate Study Trail passes directly through and adjacent to both reservoirs and defined trail ruts are visible. Both sites provide good trail interpretation, and signs of overnight camping are evident at these dispersed recreation sites.

There are no ATRs within this AU, but there are many multiple interconnecting roads that provide good access to the Study Trail and associated viewing areas. These include King Hill Road, a well-graded two-lane gravel road, and Berry Ranch Road, a well-graded single-lane gravel road, along with many other well-graded secondary gravel roads.

Overall, BLM interpretation is very limited in this area as this portion of trail is still under study, and many segments of the trail are not well defined with BLM Carsonite markers. Some markers were noted, but their application was dispersed.

Other recreational opportunities in the area consist of dispersed camping and hunting on BLM-managed lands, though no BLM-managed trailheads or campgrounds are located within this AU.

5.3.5.4 Natural Resources

This AU includes a healthy shrub-steppe environment dominated by large sagebrush. The understory is close cropped with a fair amount of bare dirt. A mix of sagebrush and short grasses, including cheatgrass, bottlebrush, squirrel tail, crested wheatgrass, and needlegrass provide the majority of ground cover. Several areas are disturbed by grazing, while select areas include wildflowers such as phlox and lupine. Soils types include sandy silt and silty sand with gravel and cobbles. In some areas, such as the bank of Emigrant Reservoir, shallow basalt bedrock is evident.

Geologic features in the natural setting include the exposed basalt bedrock of Mount Bennett Hills and Bennett Mountain to the north and northwest and the north wall of the broad Snake River Canyon to the north. Rises in land formation include King Hill in the trail's immediate vicinity, as well as Burnt Ridge to the west and the Owyhee Mountains to the southeast. In addition, rounded basalt boulders deposited by the historic Bonneville Flood are scattered across the ground surface. Small reservoirs and canyons, including Pioneer Reservoir, Emigrant Reservoir, and Little Creek Canyon, mark the landscape. Several tributaries, such as Alkali Creek, Clover Creek, Ryegrass Creek, and Cold Springs Creek are also present in the natural setting.

5.3.5.5 Other Landscape Elements

The only additional landscape element in this AU that supports the nature and purpose of the Study Trail is I-84, which serves as the NPS ATR in this area. While this major highway provides opportunities for interpretation along the Oregon NHT, the ROW and traffic also diminish the trail's scenic and historic settings. Other transportation elements in this AU include Highway 30, King Hill Road, Berry Ranch Road, Ross Road, and other gravel roads. The communities of Hagerman, Tuttle, Bliss, King Hill, and Glenns Ferry are within 5 miles of the North Alternate Study Trail but do not detract from the trail's resources, qualities, values, and settings.

Multiple intersecting transmission lines, including wood H-frame and steel lattice towers, are within close proximity to the trail in all directions and greatly diminish the overall setting. Several wind farms are also present within the AU, with concentrated wind farm developments west of King Hill and south of Bliss.

Land ownership in the AU includes large tracts of BLM-managed land separated by concentrated areas of private property. Agricultural activity is interspersed throughout the AU, particularly with areas of center-pivot irrigation surrounding the population centers. Cattle grazing is evident in select areas near the trail (IOP C1503). Additional landscape elements include Blair Trail Reservoir, Pioneer Reservoir, and an irrigation canal. These elements diminish the Study Trail by obscuring the trail and detracting from its historic setting.

5.3.6 Inventory Results: SRBOP

The SRBOP, established by Congress in 1993, is part of the BLM's National Landscape Conservation System. The BLM manages the SRBOP to preserve the area's wildlife habitat while providing other compatible land uses. The SRBOP RMP (BLM 2008) acknowledged the intact visual characteristics of the Oregon NHT when it established a visual protection corridor within the Birds of Prey Avoidance Area that included the Oregon NHT (in addition to other sensitive resources). The Oregon NHT crosses 40.5 miles of the SRBOP with 22.7 miles of the trail situated on BLM-managed land. Trails associated with the Oregon NHT (i.e., NHT[2] heritage resources associated with the Oregon Trail NHT but not a part of the congressionally designated NHT route) cross 30.9 miles of the SRBOP with 17.9 miles of these associated trails situated on BLM-managed land. The Oregon Trail ATR also crosses 43.3 miles of the SRBOP. The inventory within the SRBOP included 18 IOPs (C113, C1155, C120, C132, C137, C1501, C1502, C1505, C1506, C1507, C1508, C1514, C1523, C1524, C1526, C1527, C90, and C91). The visual, recreational, cultural, and natural resources, values, and qualities of the Oregon NHT within the SRBOP are described in the inventory results for AU3 and AU4.

6 ENVIRONMENTAL CONSEQUENCES (IMPACTS ASSESSMENT)

The identification of Project impacts (i.e., environmental consequences) on the Oregon NHT and Study Trail segments and sites is based on the changes in the existing condition caused by the development of the Revised Proposed Routes 8 and 9 or their respective alternative routes. According to BLM Manual 6280, as a part of the NEPA analysis for a proposed action, the BLM is required to "evaluate whether the proposed action would substantially interfere with or be incompatible with the nature and purpose of a National Trail (hinders or obstructs)". Within the context of that evaluation, the BLM considers:

- The extent to which the proposed action would affect the characteristics that made the trail worthy of designation;
- The extent to which the proposed action would affect the Federal Protection Components, including HPHSs or HPRSEGs located on public land administered by the BLM;
- The extent to which the proposed action would affect designated NHT properties, including remnants and artifacts from the associated period of use that may be eligible or listed on the National Register and/or determined by the National Trail administering agency to qualify as possible HPHS or HPRSEGs; and
- The extent to which the proposed action would limit the agency's ability to manage the trail for the purpose of identifying and protecting the historic route and its historic remnants and artifacts for public use and enjoyment, including interpretation, education, appreciation, and vicarious experiences.

Since a NHT Management Corridor has not been established for the Oregon NHT in Idaho through a BLM land use plan, BLM Manual 6280 requires the BLM to determine the scope of the analysis by:

- Conducting a viewshed analysis to determine if the proposed action is within the viewshed of the trail(s);
- Completing an assessment that enables identification of reasonable alternative locations for the proposed action if it is within the viewshed of the trail(s);
- Delineating the APAI;
- Identifying any adverse impacts on the nature and purposes and primary use or uses within the APAI; and
- Considering alternatives which support National Trail purposes, lie outside the APAI, or that affect a disturbed or culturally modified area such as near existing utility corridors.

The scope of the inventory and impacts analysis was limited to the APAI that extends 5 miles from the centerline of the Oregon NHT and the North Alternate Study Trail from Hemingway, Idaho, to just north of Buhl, Idaho, and just west of Wendell, Idaho. The VRI was extended to 15 miles from the Project centerline for the purposes of understanding the role of background views to the foreground/middleground visual characteristics of the APAI and consistent with the BLM's VRI requirements (BLM 1986a). The extent of the APAI was selected based upon the viewshed (see Section 4.3) used for determining the AUs, the proximity of the Project to the Oregon NHT and Study Trail to the Project, previous trails studies submitted for the Gateway West Project (Tetra Tech and URS 2011), other transmission line projects such as Boardman to Hemingway and Sun Zia Transmission Line Projects that are subject to BLM permitting (BLM 2013c, 2014), BLM Manual 6280, and BLM VRI guidance in BLM Manual H-8410-1.

To analyze the magnitude of project impacts to the Oregon NHT and the North Alternate Study Trail, this section utilizes the inventory data discussed in Section 5. The section discusses the methods used to assess Project impacts and then describes the general types of expected impacts caused by the Project, by alternative and AU, in addition to the potential for cumulative impacts, and impacts to the SRBOP.

6.1 Direct, Indirect, and Cumulative Impacts

This section describes the potential impacts associated with the Project. The section begins with a discussion of effects common to all of the Action Alternatives that include Project construction, operations, and decommissioning. This is followed by a detailed analysis of impacts on the Oregon NHT and North Alternate Study Trail as they relate to the No Action Alternative, Revised Proposed Routes, other routes, and FEIS Routes. The discussion for each Action Alternative is organized by AU and the settings, qualities, and values specific to the scenic, cultural/historic, recreation, and natural resources associated with the Oregon NHT and North Alternate Study Trail.

The direct impacts involve physical effects to trail resources, qualities, values and settings typically associated with ground disturbance for the construction of a project.

These would include construction of the actual transmission line, ancillary features and road construction. Direct impacts would most likely occur within the Project's 500-foot ROW corridor (or the 750-foot-wide sections where the proposed alternatives parallel existing transmission lines), plus those specific areas for construction activities that may be identified later in Project planning and potentially contained in an Historic Property Treatment Plan (HPTP) prepared in compliance with the NHPA.

Indirect effects cover a broader range at a landscape scale than direct impacts and include visual, auditory and atmospheric effects to the resource as a by-product of project construction and operation. Resources indirectly impacted by the project, as a function of visual, auditory and atmospheric effects, may be located within the 500-foot-wide or 750-foot-wide corridor for direct impacts; however, these resources may also be located outside this corridor. The area of indirect impacts is the APAI.

Cumulative effects result from the incremental effects related to the Project over time such as increased impacts due to new access roads, future infrastructure projects in the same corridor and additional projects such as wind turbines due to the transmission access etc. For the Project, the cumulative impacts would be most evident for the indirect visual effects to the resources, qualities, values, and settings of the Oregon NHT and North Alternate Study Trail.

6.1.1 No Action Alternative

Under the No Action Alternative, the BLM would not issue a ROW grant to the Proponents of Gateway West and the Project would not be constructed across federal lands. No land management plans would be amended to allow for the construction of this Project. No Project-related impacts to NHTs would occur; however, impacts would continue as a result of natural events (such as fire, drought, and severe weather) as well as from existing and planned developments within the Analysis Area and other projects, including wind farms, mining, agricultural, or other competing land uses. The demand for electricity, especially for renewable energy, would continue to grow in the Proponents' service territories. If the No Action Alternative is implemented, the demand for transmission services, as described in Section 1.4, Proponents' Objectives for the Project, would not be met with this Project, and the area would have to turn to other proposals to meet the transmission demand. Under the No Action Alternative, impacts similar to those described below may occur due to new transmission lines built instead of this Project.

6.1.2 Effects Common to All Action Alternatives

Construction

Construction of the Project and its ancillary facilities could directly impact segments of the Oregon NHT and North Alternate Study Trail. Short-term impacts from construction would include the visual intrusion of construction vehicles, equipment, materials, and a work force in staging areas, along access roads, and along the new transmission line ROW. Long-term impacts from construction include ground-disturbing activities that could directly disturb ruts, swales, and previously recorded and/or undetected sites associated with the trails. Project crossings and access road construction and/or improvements are the most likely locations for this type of impact to occur. Table 21

provides a list of Project crossings of the Oregon NHT on BLM-managed land by AU and Project route.

Table 21. Oregon NHT and North Alternate Oregon Trail Crossings within the APAI

Route	AU1 or NHT	AU2 or NHT	AU3 or NHT	AU4 or NHT	AU5 or NHT	Total Crossings
Revised Proposed Route 8	0	1	0	1	4	6
Revised Proposed Route 8 (BLM land only)	0	0	0	0	3	3
Route 8G	1	0	0	0	1	2
Route 8G (BLM land only)	0	0	0	0	0	0
Route 8H	1	0	3	1	1	6
Route 8H (BLM-managed land only	0	0	2	1	0	3
Revised Proposed Route 9	0	0	3	1	0	4
Revised Proposed Route 9 (BLM land only)	0	0	2	2	0	4
FEIS Proposed 9	0	0	0	0	0	0
FEIS Proposed 9 (BLM-managed land only)	0	0	0	0	0	0
Route 9K	0	0	0	0	0	0
Route 9K (BLM-managed land only)	0	0	0	0	0	0
FEIS Routes (other than 9)	2 (8A)	1 (8)	5 (9D/9G) 1 (9F/9H)	1 (8) 1 (8B) 1 (9D/9F) 1 (9G/9H)	4 (8) 2 (8A)	19
FEIS Routes (other than 9) (BLM-managed Land)	2 (8A)	0	2 (9D/9G)	1(8) 1 (9D/9F) 1 (9G/9H)	3 (8) 1 (8A)	11

Note: There is no overlap between the AUs within this table. Each AU is centered on a discrete segment of the Oregon NHT and though the AUs overlap with each other due to the 15-mile buffer, the total number of crossings above is accurate to the segment focused on in each AU.

Construction or improvement of roads may encourage unauthorized site access, artifact collection, and vandalism. These impacts would be considered adverse if they diminish the NRHP integrity of these resources, particularly their historic setting, feeling, and associational qualities.

Project construction is not expected to permanently preclude the use of or access to any existing trail-related recreation areas or activities. Some short-term impacts are expected. These include impacts to dispersed trail-related recreation activities that would likely diminish the quality of trail-related recreational activities or vicarious experiences for the duration of the construction phase of the Project. These impacts, caused by the presence of construction noises, visual disturbances, or other humans, would be localized and short-term in nature.

Vegetation removal caused by construction activities has the potential for short- and long-term impacts to natural resources, more specifically vegetation communities, within the Project area. Vegetation removal, for instance, can increase the potential for

invasive plants and the introduction of noxious weeds by transient construction vehicles moving through the Project area. This would cause changes to the visual presence of existing vegetation communities surrounding the Oregon NHT and North Alternate Study Trail.

Operations

If the transmission line is constructed, the presence of large transmission structures would introduce long-term visual impacts.

Periodic access to the transmission line ROW is required to maintain its operating function. Thus, access roads would be kept open, at least at a two-track level, which would increase the potential for vandalism and illicit artifact collection.

Decommissioning

Impacts from decommissioning would be similar to those for construction.

6.2 Direct and Indirect Effects by Route

6.2.1 Segment 8

6.2.1.1 Revised Proposed Route

Construction

The Segment 8 Revised Proposed Route runs southeast-northwest through AUs 2, 4, and 5. This route is found primarily in the Four Rivers BLM management area and, to a lesser extent, through the Shoshone BLM management area. A total of 20 KOPs surveyed along the route fall within three distinct AUs: 8 KOPs within AU2, 2 KOPs within AU4, and 10 KOPs within AU5. The route does not cross the Oregon NHT within AU2 or AU4 on BLM-managed lands, but crosses the trail four times within AU5. KOP site types along this route include primarily cultural and recreational within AU2, cultural and historic within AU4, and cultural, visual, and historic within AU5.

Along this route, cultural modifications within AU2 consist primarily of existing transmission lines between 0.5 and 4.2 miles away. Other cultural modifications within AU2 are windfarms at distances between 4 and 10 miles away, a communication tower, a fence and an unnamed road. Cultural modifications within AU4 consist of the town of Murphy 1 mile south and a transmission line 6.5 miles southeast. Cultural modifications within AU5 consist primarily of transmission lines, including two lines that cross the trail. Other cultural modifications in AU5 are Pioneer Reservoir, Emigrant Reservoir, and N. Berry Ranch Road. King Hill Road crosses the trail twice within AU5.

In AU2, the route runs roughly parallel to the Oregon NHT North Trail HPRSEG at a distance ranging from 1.5 to 5 miles. This route is situated to the south and southwest of the trail and is visible from 28.9 miles of trail; of these, 14.6 miles are on BLM-managed land. The Segment 8 Revised Proposed Route crosses the trail in one location in AU2, but not on BLM-managed land, and is therefore not within the APAI. At the convergence of the Revised Proposed Route and FEIS Route 8A, the Revised Proposed Route is less than 1 mile from the Oregon NHT for approximately 8 miles until the trail reaches Hot Springs Creek. From Hot Springs Creek, the route parallels the trail for approximately 28 miles at a distance ranging from 2 to 5 miles from the trail.

In AU4, the Segment 8 Revised Proposed Route crosses the trail, on non-BLM-managed land, near the northern edge of the AU and remains within the viewshed for 10.3 miles, 0.3 mile of which is on BLM-managed land, located over 3 miles from the trail. The visual impacts of the route are limited to the northern end of this AU, which has experienced the greatest cultural modifications within this AU due to existing transmission lines and agricultural development. The section of trail with a view of Revised Proposed Route 8 is not a part of the Sinker Creek HPRSEG; it is located about one mile north of the northern end of that HPRSEG.

Through most of AU5, Revised Proposed Route 8 closely follows the North Alternate Study Trail at a distance of 0.5 to 3 miles and crosses the trail in four locations, three of which are located on BLM-managed land. For much of its distance within this AU, the route would be located approximately 1 mile from the trail to either the north or south, as the route weaves around the trail multiple times.

Within AU2 and AU4, the Segment 8 Revised Proposed Route impacts to the trail's scenic/visual resources are anticipated to be low based on the route's weak visual contrast. This route would cause no change to the Scenic Quality Rating through these AUs, because the existing cultural modifications, even when combined with the route, would not reduce the AU's Scenic Quality Rating score below a threshold that would trigger a lower Scenic Quality Rating. Within AU5, the route's impacts to the trail's scenic/visual resources are anticipated to be low or weak based on the route's predominantly moderate visual contrast.

The Segment 8 Revised Proposed Route's impacts on recreation within AUs 2 and 4 would be low and, within AU5, low to moderate.

SRBOP

Within AU4, Revised Proposed Route 8 as well as some FEIS routes cross the SRBOP, though comparably few substantively impact the resources, values, qualities, and settings of the Oregon NHT within the SRBOP.

Operations

If the transmission line is constructed, the presence of large transmission structures would introduce long-term visual impacts.

Periodic access to the transmission line ROW is required to maintain its operating function. Thus, access roads would be kept open, at least at a two-track level, which would increase the potential for vandalism and illicit artifact collection.

6.2.1.2 Route 8G

Construction

Route 8G, of Segment 8, runs primarily through the Jarbidge BLM management area and, to a lesser extent, through the Four Rivers and Bruneau management areas. A total of 10 KOPs surveyed along the route fall within three AUs: 7 KOPs within AU1b, 1 KOP within AU3, and 2 KOPs within AU4b. The route does not cross the Oregon NHT within AU1b, AU3, or AU4b.

KOP site types along this route include primarily visual, cultural, and historic, with one recreation site, within AU1b. Visual, cultural, and historic site types fall within AU3, and cultural and visual within AU4b.

The route runs west and northwest through AU1. Views of this route are present from 22.6 miles of the Oregon NHT. Approximately 8.5 of these miles are on BLM-managed land and would have views of Route 8G that range between 0.5 to 4 miles from the trail (with an average distance of 3 miles). Route 8G crosses the Oregon NHT in Cassia Gulch (KOP C1515). For 7.8 miles, this route follows the same alignment as FEIS Route 9B between Big Pilgrim Gulch and Deadman Flat.

Cultural modifications within AU1b consist primarily of existing transmission lines between 0.3 and 2 miles away. Other cultural modifications within AU1 are windfarms at distances between 2 and 14 miles away, a fence and petroleum pipelines. Cultural modifications within AU3 consist of ID 78, 200 feet (60 meters) south, a transmission line 200 feet (60 meters) south and a waste transfer station 80 feet (25 meters) south. Cultural modifications within AU4b consist of transmission and power lines between 2 and 4 miles away. In AU1b, Route 8G may diminish the trail's scenic quality at KOP C1515 and C106 by changing the cultural modification score to a level that prompts a lower Scenic Quality Rating, from a rating of "B" to "C."

Operations

If the transmission line is constructed, the presence of large transmission structures would introduce long-term visual impacts.

Periodic access to the transmission line ROW is required to maintain its operating function. Thus, access roads would be kept open, at least at a two-track level, which would increase the potential for vandalism and illicit artifact collection.

6.2.1.3 Route 8H

Construction

Within AU1, Route 8H follows the same alignment as Route 8G. Beginning at the eastern boundary of AU1, Route 8H runs west for 35 miles, northwest for 3.5 miles, then west for the final 15 miles to AU1's western boundary. Views of Route 8H within AU1 are present from 22.6 miles of the Oregon NHT. Approximately 8.5 of these miles are on BLM-managed land and would have views of Route H that range between 0.5 to 4 miles from the trail (with an average distance of 3 miles). Within AU1, Route 8H crosses the Oregon NHT in Cassia Gulch (KOP C1515). Route 8H is visible from the Oregon NHT from all KOPs in AU1b, except for a 1.5-mile portion located approximately 7.5 miles from the west edge of AU1. For 18 miles of AU1, Route 8H also overlaps with FEIS Route 9 and Route 9K between Deadman Flat and Brown's Gulch.

Cultural modifications within AU1 consist primarily of existing transmission lines that range between 0.3 and 2 miles away. Other cultural modifications within AU1 consist of windfarms that range in distance from 2 to 14 miles away, fencing, and petroleum pipelines.

The route crosses the Oregon NHT a total of three times, twice in AU3 (C137 and C1502) and once in AU4 (C132).

Within AU3, Route 8H follows the same alignment as the Segment 9 Revised Proposed Route for 57.2 miles beginning at Dead Man Flat and extending to the western border of AU3. Route 8H also overlaps with Route 8G for the first 35 miles beginning at the eastern border of the AU and terminating just south of Bruneau Dunes State Park. A total of approximately 18 miles of Route 8H would be visible from the Oregon NHT South Alternate within AU3 at a distance of 0.5 to 5 miles (and averaging about 3 miles); 5.7 miles of which are located on BLM-managed land. Within AU3, Route 8H crosses the trail twice on BLM-managed land (C137 and C1502). Route 8H follows the trail closely along the southern end of the C.J. Strike Reservoir (remaining within 1 mile) before crossing the reservoir once to its north side.

For the entirety of AU4, Route 8H follows the same alignment as the Segment 9 Revised Proposed Route. In AU4b, the Route 8H would have a strong visual contrast at eight KOPs (C1527, C91, C132, C1507, C1514, C1505, C90, and C1506). Route 8H would have moderate adverse visual impacts and would not result in a reduction in the AU's Scenic Quality Rating. Even when combined with the Revised Proposed Route, the existing cultural modifications would not reduce the AU's Scenic Quality Rating score below a threshold that would trigger a lower Scenic Quality Rating. Route 8H is visible from the Oregon NHT for 20.2 miles within AU4b at a distance of 0.5 to 5 miles (and averaging 4 miles) Approximately 11.4 miles of these miles are on BLM-managed land and would have views of Route 8H. Route 8H crosses the trail once on BLM-managed land (C132). At the southern end of AU4 near Black Butte, Route 8H is runs at a distance of 4.5 miles from the trail and remains at that distance until crossing the Snake River just north of Sinker Creek Butte. From Sinker Creek Butte to the east end of the town of Murphy, Idaho, Route 8H runs at an average distance of 0.5 mile from the trail and would appear prominent in the viewshed. The segment of Oregon NHT that parallels Route 8H is the Sinker Creek HPRSEG, except within a small section on the east end of Murphy and within a small patch of agricultural land west of Sinker Creek Butte. After the town of Murphy, Route 8H continues west, and the trail continues north for 3 miles until the northern edge of this AU.

Within AU5, Route 8H follows the same alignment as Route 8G. Route 8H runs at a distance of approximately 9 to 11 miles from the trail except at the far southeastern edge of AU5, where the North Alternate Study Trail is crossed by Route 8H near Hagerman on private lands. Route 8H runs west and northwest through AU5. There would be little to no visual impact from this route to the Study Trail as it exists on BLM-managed land in AU5.

SRBOP

Route 8H would have six adverse impacts on the Oregon NHT within the SRBOP, two of which occur within AU3 and four within AU4.

Operations

If the transmission line is constructed, the presence of large transmission structures would introduce long-term visual impacts.

Periodic access to the transmission line ROW is required to maintain its operating function. Thus, access roads would be kept open, at least at a two-track level, which would increase the potential for vandalism and illicit artifact collection.

6.2.2 Segment 9

6.2.2.1 Revised Proposed Route 9

Construction

The Segment 9 Revised Proposed Route runs primarily through the Four Rivers BLM management area and, to a lesser extent, through the Jarbidge BLM management area. A total of 22 KOPs surveyed along the route fall within three AUs: 3 KOPs within AU1, 9 KOPs within AU3, and 10 KOPs within AU4. The route crosses the Oregon NHT a total of four times, twice in AU3 (C137 and C1502) and twice in AU4 (C132 and C1514).

KOP site types along this route include primarily cultural, historic and visual within AU1; cultural, historic, visual, and recreation within AU3; and cultural, historic, and visual within AU5.

Cultural modifications within AU1 consist primarily of existing transmission lines between 0.3 and 2 miles away. Another cultural modification within AU1 are windfarms located 5 miles east. Cultural modifications within AU3 include existing transmission lines crossing the trail in two places. State Highway 78 and a waste transfer station are both within less than 200 feet (60 meters) and C.J. Strike Reservoir is about 650 feet (200 meters) north. Cultural modifications within AU4 consist primarily of existing transmission and power lines, 0.5 to 6.5 miles away. Other cultural modifications in AU4 are a hazardous waste landfill 2 miles away, a barbed wire fence crossing the trail, the town of Murphy 0.25 mile south, State Highway 78 south by 0.25 mile, and an earthen dam to the north.

The Segment 9 Revised Proposed Route overlaps with Route 9K through all of AU1. The route passes roughly northwest, west, and northwest again through AU1. Most of this route would not be visible from the Oregon NHT, including the North Trail HPRSEG. Very narrow views of this route are present for 0.5 mile of the Oregon NHT within the Black Mesa Flats area southeast of Glenns Ferry at a distance of over 7 miles, but this is not on BLM-managed land. There are no visual impacts to the Oregon NHT from the Segment 9 Revised Proposed Route or Route 9K on BLM-managed land within AU1.

A total of 18 miles of the Segment 9 Revised Proposed Route would be visible from the Oregon NHT South Alternate within AU3 at a distance of 0.5 to 5 miles (and averaging 4 miles). Approximately 5.7 miles of the Oregon NHT South Alternate on BLM-managed land would have views of Segment 9 Revised Proposed Route. Within this viewshed, the route crosses the trail three times and C.J. Strike Reservoir once. The route follows the trail closely along the southern end of the reservoir within 1 mile before crossing to its north side. The route would not be visible in any other location within this AU.

In AU4b, the Segment 9 Revised Proposed Route would have strong visual contrasts at eight KOPs (C1527, C91, C132, C1507, C1514, C1505, C90, and C1506). The route would have moderate adverse visual impacts and would not result in a reduction in the AU's Scenic Quality Rating. Even when combined with the Segment 9 Revised

Proposed Route, the existing cultural modifications would not reduce the AU's Scenic Quality Rating score below a threshold that would trigger a lower Scenic Quality Rating. The route is visible from the Oregon NHT for 20.2 miles within AU4b at a distance of 0.5 to 5 miles (and averaging 4 miles). Approximately 11.4 miles of the Oregon NHT on BLM-managed land would have views of Segment 9 Revised Proposed Route. The route does not cross the trail on BLM-managed land within AU4. At the southern end of AU4 near Black Butte, the route is located 4.5 miles from the trail and remains at that distance until crossing the Snake River just north of Sinker Creek Butte. From Sinker Creek Butte to the east end of the town of Murphy, Idaho, the route is located on average 0.5 mile from the trail and would be very prominent in the viewshed. The segment of Oregon NHT that parallels the Revised Proposed Route for Segment 9 is the Sinker Creek HPRSEG, except within a small section on the east end of Murphy and within a small patch of agricultural land west of Sinker Creek Butte. After the town of Murphy, the route continues west and the trail continues north at a distance of over 3 miles until the northern edge of AU4.

SRBOP

The majority of impacts to the Oregon NHT within the SRBOP are from the Segment 9 Revised Proposed Route and the route's associated FEIS routes (9D, 9G, 9H, and 9F) that lie to the north and south of the Snake River Valley. Several routes associated with Segment 8 Revised Proposed Route and its FEIS routes cross the SRBOP but comparably few substantively impact the resources, values, qualities, and settings of the Oregon NHT within the SRBOP.

Operations

If the transmission line is constructed, the presence of large transmission structures would introduce long-term visual impacts.

Periodic access to the transmission line ROW is required to maintain its operating function. Thus, access roads would be kept open, at least at a two-track level, which would increase the potential for vandalism and illicit artifact collection.

6.2.2.2 FEIS Proposed 9

Construction

The 162.2-mile long FEIS Proposed 9 runs primarily through the Jarbidge, Bruneau, and Owyhee BLM management areas, and to a lesser extent, through the Four Rivers BLM management area. A total of 13 Oregon NHT KOPs, situated within AU1, AU3, and AU4, are within 5 miles of the route and would have visibility of the transmission line. The route would not be visible from any KOPs in AU2 or AU5. FEIS Proposed 9 does not cross the Oregon NHT.

KOP site types along this route include visual, cultural, historic, and recreation resources in AU1 and AU2 and visual, cultural, and historic resources in AU4.

Cultural modifications along the route include transmission lines to the northeast in AU1. Transmission lines, Idaho Highway 78, and agricultural fields, and C.J. Strike Reservoir are situated in AU3. Transmission lines, State Highway 78, the town of Murphy, a

hazardous waste facility, and an earthen dam are in close proximity to the KOPs in AU4.

Through 34.3 miles of AU1, FEIS Proposed 9 runs generally parallel to the Oregon NHT, varying from 2 to 5 miles south of the trail in distance. The route follows the same alignment as Route 9K for the entirety of AU1 and follows the same alignment as Route 8G through the western 18.1 miles of AU1. Views of FEIS Proposed 9 within AU1 are present from 6.3 miles of the Oregon NHT at the west end of AU1 at a distance of 2 to 3 miles; 1.4 of these miles are on BLM-managed lands. Three KOPs in AU1 have visibility of the route (C106, C97, and C61), from a distance between 3.2 miles and 4.5 miles. The route would not change the scenic quality, and would have no adverse impact on cultural, historic, and recreation resources. The route would have no impact on natural resources.

In AU2, FEIS Proposed 9 is located approximately 3 to 36 miles south of the Oregon NHT North Trail and is not visible from any KOPs in this AU.

In AU3, FEIS Proposed 9 follows the same alignment as Route 9K for 32.4 miles and Route 8G for 23 miles. This route does not follow any other routes for the remaining western half of AU1. The route falls within 1.7 miles south of the Oregon NHT near C.J. Strike Ruts (C1501), and 2.0 and 2.5 miles south of C.J. Strike Reservoir (C1155 and C1502), respectively, but is not visible from these KOPs. The route is visible for 36.9 miles of the Oregon NHT South Alternate in AU3 at a distance of 0.5 to 5 miles (and averaging 4 miles), including three KOPs (C113, C1133, and C137). A total of 13.8 miles of the Oregon NHT South Alternate on BLM-managed land would have views of FEIS Proposed 9. From KOP C113, FEIS Proposed 9 is approximately 2.8 miles south of the Oregon NHT South Alternate and is visually separated from the trail by State Highway 78, which is approximately 200 feet (60 meters) south of the Oregon NHT at this KOP. From the Recreation view at C1133, FEIS Proposed 9 is approximately 4.2 miles southwest of the KOP. From the simulation point at KOP C137, FEIS Proposed 9 is approximately 4.2 miles southwest of the KOP, and is visually separated by other transmission lines that cross the trail within the immediate setting. Within AU3, FEIS Proposed 9 would have no adverse impact on cultural, historic, and recreation resources, and would have no impact on natural resources.

In AU4, FEIS Proposed 9 follows the same alignment as Route 8G for 3.2 miles, and lies approximately 2.3 miles south and east of the Utter Massacre Site (C1528). The route then follows the same alignment as the Segment 9 Revised Proposed Route at the west end of the SRBOP and then also with Routes 8G and 9K before terminating in Hemingway. The route generally parallels the Oregon NHT south of the trail at a distance of 2 to 5 miles, except for a small area to the west of Murphy where the route comes within 1.2 miles of the trail. Though the route is expected to be visible in the distance for almost the entirety of AU4 (approximately 55.4 miles), only 16.6 of those miles are located on BLM-managed land. Impacts in AU4 are localized near the northwest end, where the Sinker Creek HPRSEG heads west toward the route before turning sharply to the north. In this area, situated within the SRBOP, the route is visible from six KOPs (C132, C90, C1506, C1507, C1514, and C1505), with distances ranging from 1 mile (C90) to 3.2 miles (1505) from the KOPs. From C1506 and C1514, both of which are where other Project routes cross the Oregon NHT, FEIS Proposed 9 would

moderately contrast with the visual setting, but would not adversely impact scenic/visual, cultural/historic, or natural resources.

In AU5, FEIS Proposed 9 is located approximately 9.8 to 19 miles south of the North Alternative Study Trail and is not visible from any KOPs in this AU.

Operations

If the transmission line is constructed, the presence of large transmission structures would introduce long-term visual impacts.

Periodic access to the transmission line ROW is required to maintain its operating function. Thus, access roads would be kept open, at least at a two-track level, which would increase the potential for vandalism and illicit artifact collection.

6.2.2.3 Route 9K

Construction

Route 9K of Segment 9 runs primarily through the Jarbidge BLM management area and, to a lesser extent, through the Four Rivers and Bruneau BLM management areas. A total of six KOPs surveyed along the route fall within three AUs: three KOPs within AU1, one KOP within AU3, and two KOPs within AU4. The route does not cross the Oregon NHT.

KOP site types along this route include primarily cultural, historic, and visual sites within AU1 and AU3, and cultural and visual sites within AU4.

Cultural modifications within AU1 consist primarily of existing transmission lines between 0.3 and 2 miles away. Another cultural modification within AU1 is a windfarm 5 miles east. Cultural modifications within AU3 include Idaho Highway 78 60 meters south, a waste transfer station 25 meters south, and existing transmission lines 60 meters south. Cultural modifications within AU4 consist of existing transmission and power lines between 2 and 4 miles away.

Route 9K follows the same alignment as the Segment 9 Revised Proposed Route through AU1. The route passes roughly northwest, west, and northwest again through the AU. Most of this route would not be visible from the Oregon NHT, including the North Trail HPRSEG. Very narrow views of this route are present for 0.5 mile of the Oregon NHT within the Black Mesa Flats area southeast of Glenns Ferry, but this is not on BLM-managed land. There are no visual impacts to the Oregon NHT from Route 9K on BLM-managed land within AU1. The remainder of Route 9K follows the same alignment as Route 8G and Route 9K would have an identical impact on the trail as Route 8G in AUs 3 and 4.

Operations

If the transmission line is constructed, the presence of large transmission structures would introduce long-term visual impacts.

Periodic access to the transmission line ROW is required to maintain its operating function. Thus, access roads would be kept open, at least at a two-track level, which would increase the potential for vandalism and illicit artifact collection.

6.2.3 Toana Road Variations 1 and 1-A and the Comparison Portion of the Revised Proposed Route

Neither of the Toana Road Variations (1 and 1-A) would be visible from any Congressionally Designated Trail Segments (NHT[1]) or Oregon Trail Segments (NHT[2]) being analyzed for purposes of this report.

Since the Toana Road Variations have no potential visual impact to any NHT[1] or NHT[2] resources, an effects analysis was not necessary when prepared consistent with BLM Manual 6280. No construction or operations impacts from the Toana Road Variations are anticipated.

Visual impacts to the Toana Road as an eligible historic property are addressed within Section 3.3 – Cultural Resources of the Draft SEIS. The Toana Road is not a designated NHT Study Trail or Oregon Trail–related feature.

6.2.4 SRBOP

The majority of impacts to the Oregon NHT within the SRBOP are from the Segment 9 Revised Proposed Route and the route's associated FEIS routes that lie to the north and south of the Snake River Valley. Several routes associated with the Segment 8 Revised Proposed Route and its FEIS routes cross the SRBOP but comparably few substantively impact the resources, values, qualities and settings of the Oregon NHT within the SRBOP.

6.2.5 Summary of Route Impacts

Attachment F consists of a detailed spreadsheet that describes the Project impacts to visual, recreational, cultural, and natural resources, qualities, and values of the Oregon NHT and the North Alternate Study Trail. These impacts to individual KOPs were assessed using the impact thresholds described in Table 2. Table 22 below includes the total number of KOPs that would experience an adverse impact to any of the trail-related resources, qualities, and/or values present at that location from each of the Project proposed routes and alternative routes.

Table 22. Summary of Project Impacts

Segment	AU1	AU2	AU3	AU4	AU5	Total	SRBOP
Segment 8 Revised Proposed Route							
Adverse Impact	–	–	–	–	7	7	0
No Adverse Impact	–	8	-	1	3	12	1
Segment 8 (FEIS Proposed Route)							
Adverse Impact	–	–	–	1	7	8	1
No Adverse Impact	–	8	-	5	3	16	5
Route 8A							
Adverse Impact	6	–	–	–	1	7	0
No Adverse Impact	3	8	–	–	4	15	0
Route 8B							
Adverse Impact	–	–	–	–	–	0	0
No Adverse Impact	–	1	–	–	–	1	0
Route 8E							
Adverse Impact	–	–	–	1	–	1	1
No Adverse Impact	–	–	–	5	–	5	5

Table 22. Summary of Project Impacts (continued)

Segment	AU1	AU2	AU3	AU4	AU5	Total	SRBOP
Route 8G							
Adverse Impact	3	–	–	-	–	3	0
No Adverse Impact	4	–	1	2	–	7	2
Route 8H							
Adverse Impact	5	–	2	4	–	11	6
No Adverse Impact	3	–	4	4	–	11	7
Segment 9 Revised Proposed Route							
Adverse Impact	-	-	5	5	–	10	9
No Adverse Impact	3	-	4	5	–	12	9
FEIS Proposed 9							
Adverse Impact	-	–	–	–	–	0	0
No Adverse Impact	3	–	4	7	–	14	9
Route 9B							
Adverse Impact	4	–	–	–	–	4	0
No Adverse Impact	2	–	–	–	–	2	0
Route 9D							
Adverse Impact	–	–	5	4	-	9	8
No Adverse Impact	–	–	3	6	-	9	9
Route 9F							
Adverse Impact	–	–	–	4	–	4	4
No Adverse Impact	–	–	3	6	–	9	9
Route 9G							
Adverse Impact	–	–	5	6	–	11	10
No Adverse Impact	–	–	3	4	–	7	7
Route 9H							
Adverse Impact	–	–	1	5	–	6	6
No Adverse Impact	–	–	4	5	–	9	8
Route 9I							
Adverse Impact	–	–	–	–	–	0	0
No Adverse Impact	–	–	–	1	–	1	1
Route 9K							
Adverse Impact	–	–	–	–	–	0	0
No Adverse Impact	3	–	1	2	–	6	2

Of the routes considered in the SEIS, the two with the fewest adverse impacts are Route 8G and Route 9K. Three of the 20 KOPs situated along Route 8G would experience adverse impacts while none of the 6 KOPs along Route 9K would experience adverse impacts. Of the routes considered in the SEIS, the Segment 8 Revised Proposed Route and Segment 9 Revised Proposed Route would result in the greatest number of adverse impacts. Seven of the 20 KOPs located along Segment 8 would experience adverse impacts and 10 of the 22 KOPs located along Segment 9 would experience adverse impacts.

The analysis also revealed that several proposed routes analyzed under the Gateway West FEIS could be utilized to reduce the number of impacts to the Oregon NHT and North Alternate Study Trail for portions of routes explored in the SEIS. FEIS Route 8B, for instance, could provide an alternative route to the Segment 8 Revised Proposed Route from the Ada/Elmore County line to the Hemingway Substation that would entirely avoid both the SRBOP and crossing an intact segment of the Oregon NHT.

FEIS Proposed 9 would also result in no adverse impacts to trail resources either inside or outside the SRBOP.

The Segment 9 Revised Proposed Route would have the greatest number of adverse impacts to the Oregon NHT in the SRBOP resulting in nine adverse impacts from the 18 KOPs in the SRBOP with visibility of this route. Route 8H would result in six adverse impacts from the 13 Oregon NHT KOPs in the SRBOP with visibility of this route. The Segment 8 Revised Proposed Route, Route 8G, FEIS Proposed 9, and Route 9K would not result in any adverse impacts to the Oregon NHT in the SRBOP.

6.3 Cumulative Effects

For the purposes of this analysis, the temporal extent of the projects to be considered is the expected physical operational service life of this Project (50 years), plus the estimated 10 years needed for substantial site rehabilitation after decommissioning is completed. Past and present events and projects are generally identified and their ongoing impacts discussed. "Reasonably foreseeable actions" are proposed projects or actions that have applied for a permit from local, state, or federal authorities or which are publicly known.

The spatial extent of the projects considered in the cumulative effects analysis varies by the project and by resource. In several cases, the Cumulative Impact Analysis Area (CIAA) for a resource is substantially larger than the corresponding project-specific Analysis Area in order to consider an area large enough to encompass likely effects from other projects on the same resource.

The Project "footprint" or direct construction ground disturbance extent is defined in the Proponent's August 2013 Plan of Development, which is Appendix B to the 2013 ROD (BLM 2013b) and summarized in Chapter 2 of the SEIS. The CIAA for direct disturbance starts with an area defined as 500 feet on either side of the centerline of the Proposed Route or Route Alternatives and 25 feet on either side of indicative road location centerlines and includes the actual footprint of other Project-related facilities outside the 1,000-foot-wide area, including temporary facilities such as fly yards and laydown areas. For the purposes of this chapter, that set of polygons is called the Direct Impact Cumulative Impact Analysis Area (DICIAA). That set of polygons was then used to overlay various resource extents. For the purposes of the Manual 6280 Impact analysis, the CIAA extends 5 to 15 miles from the DICIAA.

6.3.1 Cumulative Effects Analysis

Gateway West and the other current and reasonably foreseeable actions would result in substantial cumulative adverse effects to NHTs. Construction of the Gateway West transmission line and its ancillary facilities could directly impact the existing Oregon NHT, the North Alternate Study Trail, and its associated visual contexts, recreational values and settings, and associated cultural resources and landscapes. Construction or other ground-disturbing activities could directly or indirectly impact previously undetected components of the Oregon NHT. Such impacts are likely to be adverse. Identification of new or previously recorded segments and sites associated with the Oregon NHT and North Alternate Study Trail could result in increased use of existing and new access roads and may encourage unauthorized site access, artifact collection,

and vandalism. Impacts on the setting and feeling of the Oregon NHT may be introduced through the addition of structural elements to the landscape. Construction of transmission line structures introduces an indirect (visual) impact upon the visual contexts, recreational values, and historic/cultural settings of the Oregon NHT.

Other current and reasonably foreseeable activities with ground-disturbing activities (essentially all those listed in Section 4.2 of the SEIS) have the potential for additional effects on NHTs and associated resources. Some of the more visually prominent activities are included in Attachment E, which includes maps of each Analysis Unit and the locations of existing transmission lines and wind farms. These projects have already affected the visual environments around the Oregon NHT and the North Alternate Study Trail and, in some areas, already degraded the visual, cultural, recreational, and natural resources, qualities, values, and settings related to the trails primary purpose and use. The maps in Attachment E also provide an indication of how the Project either falls into the immediate foreground of trail-related settings, thus having a larger impact than the existing projects, or falls into the background, where it is largely obscured by existing energy infrastructure.

The Proponents of Gateway West have committed to avoiding direct effects to NRHP-eligible features wherever feasible. Avoidance of indirect effects is not likely to be possible. HPTPs will be prepared for site-specific treatments for areas that may experience direct or indirect effects to be reviewed and approved by the BLM prior to issuance of a Notice to Proceed for that work element. An indirect effect of Gateway West is that potential for increased access due to new access roads may encourage unauthorized site access, artifact collection, and vandalism as well as visual effects caused by construction of the Project. This is the case with all of the current and reasonably foreseeable projects that have new or improved access roads associated with them.

6.4 Direct and Indirect Effects of the Alternatives

This section includes a summary of direct and indirect effects to the Oregon NHT and North Alternate Study Trail. Table 23, which summarizes the total number of adverse impacts on the Oregon NHT for each of the seven action alternatives, is followed by narratives that describe the nature and magnitude of these adverse impacts to specific NHT resources.

Table 23. Summary of Adverse Impacts on the Oregon NHT for Each Alternative

Alternative	Impact	AU1	AU2	AU3	AU4	AU5	Total	SRBOP	Alternative Total
Alternative 1 (Revised Proposed Action)	Segment 8 (Revised Proposed Route)								17 Adverse Impacts 10 Trail Crossings (7 on BLM-managed land) 24 No Adverse Impacts
	Adverse Impact	---	---	---	---	7	7	0	
	No Adverse Impact	---	8	---	1	3	12	1	
	Segment 9 (Revised Proposed Route)								
	Adverse Impact	---	---	5	5	---	10	9	
	No Adverse Impact	3	---	4	5	---	12	9	
Alternative 2 (BLM Co-Preferred Alternative)	Segment 8 (Revised Proposed Route)								7 Adverse Impacts 6 Trail Crossings (3 on BLM-managed land) 26 No Adverse Impacts
	Adverse Impact	---	---	---	---	7	7	0	
	No Adverse Impact	---	8	---	1	3	12	1	
	Segment 9 (FEIS Proposed Route)								
	Adverse Impact	---	---	---	---	---	0	0	
	No Adverse Impact	3	---	4	7	---	14	9	

Table 23. Summary of Adverse Impacts on the Oregon NHT for Each Alternative (continued)

Alternative	Impact	AU1	AU2	AU3	AU4	AU5	Total	SRBOP	Alternative Total
Alternative 3	Segment 8 (Revised Proposed Route)								
	Adverse Impact	---	---	---	---	7	7	0	7 Adverse Impacts 6 Trail Crossings (3 on BLM-managed land) 18 No Adverse Impacts
	No Adverse Impact	---	8	---	1	3	12	1	
	Segment 9 (Route 9K)								
	Adverse Impact	---	---	---	---	---	0	0	
	No Adverse Impact	3	---	1	2	---	6	2	
Alternative 4	Segment 8 (Route 8G)								
	Adverse Impact	3	---	---	---	---	3	0	3 Adverse Impacts 2 Trail Crossings (0 on BLM-managed land) 21 No Adverse Impacts
	No Adverse Impact	4	---	1	2	---	7	2	
	Segment 9 (FEIS Proposed Route)								
	Adverse Impact	---	---	---	---	---	0	0	
	No Adverse Impact	3	---	4	7	---	14	9	
Alternative 5 (BLM Co-Preferred Alternative)	Segment 8 (Route 8G)								
	Adverse Impact	3	---	---	---	---	3	0	3 Adverse Impacts 2 Trail Crossings (0 on BLM-managed land) 13 No Adverse Impacts
	No Adverse Impact	4	---	1	2	---	7	2	
	Segment 9 (Route 9K)								
	Adverse Impact	---	---	---	---	---	0	0	
	No Adverse Impact	3	---	1	2	---	6	2	
Alternative 6	Segment 8 (Route 8H)								
	Adverse Impact	5	---	2	4	---	11	6	11 Adverse Impacts 6 Trail Crossings (3 on BLM-managed land) 25 No Adverse Impacts
	No Adverse Impact	3	---	4	4	---	11	7	
	Segment 9 (FEIS Proposed Route)								
	Adverse Impact	---	---	---	---	---	0	0	
	No Adverse Impact	3	---	4	7	---	14	9	
Alternative 7	Segment 8 (Route 8H)								
	Adverse Impact	5	---	2	4	---	11	6	11 Adverse Impacts 6 Trail Crossings (3 on BLM-managed land) 17 No Adverse Impacts
	No Adverse Impact	3	---	4	4	---	11	7	
	Segment 9 (Route 9K)								
	Adverse Impact	---	---	---	---	---	0	0	
	No Adverse Impact	3	---	1	2	---	6	2	

6.4.1 Alternative 1 – Proposed Action (the Revised Proposed Routes for Segments 8 and 9)

Alternative 1, the Revised Proposed Action, would have 17 adverse impacts on the Oregon NHT, with impacts associated with the Segment 8 Revised Proposed Route in AU5 (7) and Segment 9 Revised Proposed Route in AU3 (5) and AU4 (5). Four of these adverse impacts are to KOPs located on the Oregon NHT Sinker Creek HPRSEG. Alternative 1 would have no adverse impact on the 24 KOPs from which the alternative would be visible. Seven of the 17 adverse impacts would be caused by trail crossings on BLM-managed land.

Alternative 1 would cross the Oregon NHT a total of seven times on BLM-managed land, three of which would be caused by the Segment 8 Revised Proposed Route. Specifically, three of the five adverse impacts in AU3 and five of the seven adverse impacts in AU5 would be caused by Alternative 1 crossing the Oregon NHT.

Nine of the adverse impacts, all associated with the Segment 9 Revised Proposed Route are on the SRBOP. Four of the trail crossings are in the SRBOP.

Alternative 1, compared to all the Alternatives, would have the greatest number of adverse impacts (17) on the Oregon NHT and the largest number of trail crossings on

BLM-managed land (7). Alternative 6 and Alternative 7 would have the next largest number of adverse impacts (11 for each alternative).

Alternative 1 would also have the greatest number of adverse impacts (9) to the Oregon NHT within the SRBOP. Alternative 6 and Alternative 7 have the next largest number of adverse impacts in the SRBOP (six for each alternative).

Toana Road Variations 1 or 1-A would not have an impact upon any NHT resources.

6.4.2 Alternative 2 – Revised Proposed 8 and FEIS Proposed 9

Alternative 2, a Co-Preferred Alternative, would have seven adverse impacts on the Oregon NHT, all located within AU5 and associated with the Segment 8 Revised Proposed Route. Three of the adverse impacts would be caused by trail crossings on BLM-managed land. Alternative 2 would have no adverse impact on the 26 KOPs from which the alternative would be visible. FEIS Proposed 9 would have no adverse impacts on the Oregon NHT.

Alternative 2 would have no adverse impact on the 11 KOPs in the SRBOP from which the alternative would be visible.

Compared to Alternative 1, Alternative 2 would have 10 fewer adverse impacts (7) on the Oregon NHT, including 4 fewer trail crossings on BLM-managed land (3), and 9 fewer adverse impacts (0) in the SRBOP. Only AU5 would be adversely impacted by Alternative 2, whereas Alternative 1 would adversely impact three AUs.

Toana Road Variations 1 or 1-A would not have an impact upon any NHT resources.

6.4.3 Alternative 3 – Revised Proposed 8 and the 9K Route

Alternative 3 would have seven adverse impacts on the Oregon NHT, all located within AU5 and associated with the Segment 8 Revised Proposed Route. Three of the adverse impacts would be caused by trail crossings on BLM-managed land. Alternative 3 would have no adverse impact on the 18 KOPs from which the alternative would be visible.

Alternative 3 would have no adverse impact on the four KOPs in the SRBOP from which the alternative would be visible.

Compared to Alternative 1, Alternative 3 would have 10 fewer adverse impacts (7) on the Oregon NHT, including 4 fewer trail crossings on BLM-managed land (3), and 9 fewer adverse impacts (0) in the SRBOP. Only AU5 would be adversely impacted by Alternative 3, whereas Alternative 1 would adversely impact three AUs.

Toana Road Variations 1 or 1-A would not have an impact upon any NHT resources.

6.4.4 Alternative 4 – The 8G Route and FEIS Proposed 9

Alternative 4 would have a total of three adverse impacts on the Oregon NHT, all located within AU1 and associated with the 8G route. Two of these adverse impacts affect KOPs located on the Oregon NHT North Trail HPRSEG. None of the Adverse Impacts would be caused by trail crossings on BLM-managed land. Alternative 4 would have no adverse impact on the 21 KOPs from which the alternative would be visible.

Alternative 4 would have no adverse impact on the 11 KOPs in the SRBOP from which the alternative would be visible.

Compared to Alternative 1, Alternative 4, along with Alternative 5, would have the least number of adverse impacts on the Oregon NHT (3), with 14 fewer impacts. Adverse impacts would be limited to AU1 and are associated with the 8G route. Alternative 4 would not cross the Oregon NHT on BLM-managed land, compared to Alternative 1, which would cross the Oregon NHT seven times on BLM-managed land. Alternative 4 would not adversely impact the Oregon NHT in the SRBOP, compared to Alternative 1, which would have nine adverse impacts in the SRBOP.

Toana Road Variations 1 or 1-A would not have an impact upon any NHT resources.

6.4.5 Alternative 5 – The 8G and 9K Routes

Alternative 5, a Co-Preferred Alternative, would have a total of three adverse impacts on the Oregon NHT, all located within AU1 and associated with Route 8G. Two of these adverse impacts affect KOPs located on the Oregon NHT North Trail HPRSEG. None of the adverse impacts would be caused by trail crossings on BLM-managed land. Alternative 5 would have no adverse impact on the 13 KOPs from which the alternative would be visible.

Alternative 5 would have no adverse impact on the four KOPs in the SRBOP from which the alternative would be visible.

Compared to Alternative 1, Alternative 5, along with Alternative 4, would have the least number of adverse impacts on the Oregon NHT (3), with 14 fewer impacts. Adverse impacts would be limited to AU1 and are associated with Route 8G. Alternative 5 would not cross the Oregon NHT on BLM-managed land, whereas Alternative 1 would cross the Oregon NHT seven times on BLM-managed land. Alternative 5 would not adversely impact the Oregon NHT in the SRBOP, while Alternative 1 would have nine adverse impacts in the SRBOP.

Toana Road Variations 1 or 1-A would not have an impact upon any NHT resources.

6.4.6 Alternative 6 – The 8H Route and FEIS Proposed 9

Alternative 6 would have a total of 11 adverse impacts on the Oregon NHT, with impacts located in AU1 (5), AU3 (2), and AU4 (4). All of the impacts are associated with Route 8H. Six of these adverse impacts affect KOPs located on the Oregon NHT North Trail HPRSEG (3) and the Oregon NHT Sinker Creek HPRSEG. Three of the adverse impacts would be caused by trail crossings on BLM-managed land. Alternative 6 would have no adverse impact on the 25 KOPs from which the alternative would be visible.

Alternative 6 would have an adverse impact on the six KOPs within the SRBOP and no adverse impact on the seven KOPs in the SRBOP from which the alternative would be visible.

Compared to Alternative 1, Alternative 6 would have six fewer adverse impacts (11) on the Oregon NHT, including four fewer trail crossings on BLM-managed land (3), and three fewer adverse impacts (6) in the SRBOP. Alternative 6 would have adverse impacts in AU1, AU3, and AU4, whereas Alternative 1 would have adverse impacts in AU2, AU4, and AU5.

Toana Road Variations 1 or 1-A would not have an impact upon any NHT resources.

6.4.7 Alternative 7 – The 8H and 9K Routes

Alternative 7 would have a total of 11 adverse impacts on the Oregon NHT, with impacts located in AU1 (5), AU3 (2), and AU4 (4). All of the impacts are associated with Route 8H. Six of these adverse impacts affect KOPs located on the Oregon NHT North Trail HPRSEG (3) and the Oregon NHT Sinker Creek HPRSEG. Three of the adverse impacts would be caused by trail crossings on BLM-managed land. Alternative 7 would have no adverse impact on the 17 KOPs from which the alternative would be visible.

Alternative 7 would have an adverse impact on six KOPs within the SRBOP and no adverse impact on the seven KOPs in the SRBOP from which the alternative would be visible.

Compared to Alternative 1, Alternative 7 would have six fewer adverse impacts (11) on the Oregon NHT, including four fewer trail crossings on BLM-managed land (3), and three fewer adverse impacts (6) in the SRBOP. Alternative 7 would have adverse impacts in AU1, AU3, and AU4, whereas Alternative 1 would have adverse impacts in AU2, AU4, and AU5.

Toana Road Variations 1 or 1-A would not have an impact upon NHT resources.

6.5 Plan Amendments

Amendments to the BLM RMPs and MFPs are summarized for each alternative in Table 2.3-1 in Chapter 2 of the SEIS. The BLM plan amendments are discussed in detail in Appendices F and G of the SEIS. Amendments are needed to permit the Project to cross various areas of BLM-managed land. The effects described for areas requiring an amendment in order for the Project to be built would only occur if the amendment were approved, and amendments that alter land management designations could change future use of these areas.

The Segments 8 and 9 Revised Proposed Routes would require BLM plan amendments. The Revised Proposed Route for Segment 8 would require a plan amendment to the 1987 Jarbidge RMP to protect the Oregon NHT ruts from surface disturbance within a 0.25-mile corridor. The Bennett Hills/Timmerman Hills MFP would also require a plan amendment to manage NHT resources with applicable laws and policies. Additional amendments would be required for visual resources that would also affect the cultural aspects of these resources (see Section 3.2 – Visual Resources).

The Revised Proposed Route for Segment 9 would require three amendments to the SRBOP RMP:

- A corridor 250 feet from the centerline of the proposed powerline would be established with a VRM of Class III. This corridor would maintain a distance of at least 0.5 mile from the NHT, except where it crosses the trail.
- The Snake River Canyon SRMA: This SRMA consists of 22,300 acres in the Snake River Canyon downstream from Grandview, Idaho that is managed for the protection of cultural and scenic values. Allow a 500-kV transmission line to

cross the SRMA while protecting cultural resources, which includes NHT resources, from surface disturbance.

- C.J. Strike SRMA: This SRMA consists of 16,900 acres surrounding C.J. Strike Reservoir along the Snake River. The purpose of the SRMA is to provide enhanced recreation management associated with the reservoir, and protection of the Oregon NHT adjacent to the reservoir. Allow a 500-kV transmission line to cross the SRMA while protecting the Oregon NHT from surface disturbance.

VRM Class II areas associated with the Oregon Trail and Snake River in view of the 500-kV transmission line that would not meet VRM Class II objectives of the C.J. Strike SRMA would be reclassified to VRM Class III.

6.6 Proponent-Proposed Design Features and Measures

6.6.1 Environmental Protection Measures & Mitigation and Enhancement Plans

The Project Proponents have committed to Project design features, best management practices, and Environmental Protection Measures (EPMs) to minimize or avoid impacts on environmental resources that include the Oregon NHT and North Alternate Study Trail. These measures, the areas where they would be applicable (e.g., private, state, or federally managed lands), as well as the details of each measure, are provided in Table 2.7-1 of the Gateway West FEIS (BLM 2013a).

As a part of the FEIS, several EPMs to avoid, minimize, and mitigate impacts to resources were developed. While EPMs for recreational, natural, visual, and cultural resources would address general impacts to NHTs and Study Trails, EPMs that directly address the avoidance and minimization of Project impacts to the Oregon NHT and North Alternate Study Trail are listed below. These measures are also included in the *Compensatory Mitigation Plan for Unavoidable Impacts to Historic Trails* in the Project ROD (Appendix F) (BLM 2013b).

VIS-6 To minimize sensitive feature disturbance and/or visual contrast in designated areas on federal lands, structures will be placed to avoid sensitive features such as riparian areas, water courses, and cultural sites, and/or to allow conductors to clearly span the features, within the limits of standard tower design. Where conflicts arise between resources, the applicable land manager will be consulted.

VIS-7 To reduce visual impacts on federal land, including potential impacts on recreation values and safety, towers will be placed at the maximum feasible distance from the highway, canyon and trail crossings within limits of standard design and to the extent practical.

VIS-11 Site-specific "micrositing," within the limits of standard engineering design, will be required near certain sensitive areas, as identified by the agencies, where proposed transmission facilities would impact visual quality; these situations include:

- Crossings over major highways;
- Crossings of high quality historic trails;

- Crossings over the North Platte and Snake Rivers;
- Sensitive travelways, use areas, residential areas, recreational facilities as identified by the agencies (including national recreation and scenic trails, campgrounds, recreation areas, and trailheads), and other areas identified by management plans; and
- To avoid bisecting forest patches within the Sawtooth National Forest.

The Proponents will consult with the applicable local land management agency during transmission line design.

CR-5 If construction will adversely affect any properties listed on, or eligible for listing on, the NRHP, mitigation will be required. Mitigation will be in accordance with the HPTP and may include, but not be limited to, one or more of the following measures: a) avoidance through the use of relocation of structures through the design process, realignment of the route, relocation of temporary workspace, or changes in the construction and/or operational design; b) the use of landscaping or other techniques that will minimize or eliminate effects on the historic setting or ambience of standing structures; and c) data recovery, which may include the systematic professional excavation of an archaeological site or the preparation of photographic and/or measured drawings documenting standing structures.

These EPMs would avoid or minimize the extent of impacts that could occur to Oregon NHT and North Alternate Study Trail. These EPMs are a part of the current Project description, and as such, the effects of their implementation are included in the impact discussion found in Section 6 of this study.

6.6.2 Proponent-Proposed MEP and Potential Effects of the MEP within the SRBOP

6.6.2.1 Habitat Restoration

In general, habitat restoration would improve the physical setting of the Oregon NHT. By restoring habitat to an earlier period that better reflects the trail's period of use, the overall historical integrity of the landscape and setting would be improved. Project impacts the Oregon NHT, therefore, would be reduced.

6.6.2.2 Purchase of Private Inholdings

The acquisition of private inholdings may improve protections of the Oregon NHT. Federal ownership would provide regulatory protections for trail resources. Those trail segments within these private inholdings that are eligible for the NRHP, for instance, would be protected by Section 106 of the National Historic Preservation Act of 1966. These trails would also be protected by the National Trails System Act, Federal Land Policy and Management Act, and the requirements of BLM Manual 6280 if BLM were to assume land management responsibilities for these parcels. Project impacts the Oregon NHT, therefore, would be reduced.

6.6.2.3 Law Enforcement

Additional law enforcement would provide additional protections for the Oregon NHT, particularly in areas where access roads are in close proximity to, or that facilitate access to the Oregon NHT. Coordination between federal and local law enforcement would allow for the protection of trail resources under federal and Idaho laws and serve as a deterrent to vandalism, disturbance, and artifact theft. Project impacts the Oregon NHT, therefore, would be reduced.

6.6.2.4 Visitor Enhancement

Visitor enhancements would be beneficial to the use and interpretation of the Oregon NHT. These enhancements would be consistent with the NPS Oregon Trail CMUP and would assist with raising awareness about Oregon NHT resources and enhance visitor experiences. Project impacts the Oregon NHT, therefore, would be reduced.

6.6.2.5 Line and Substation Removal

The removal of transmission line and substations would improve the visual setting of the Oregon NHT and North Alternate Study Trail. Cumulative visual impacts to trail resources would be reduced as views from and to trail resources would be potentially improved. Project impacts the Oregon NHT, therefore, would be reduced.

6.6.2.6 Summary of Remaining Impacts

If the proponent's EMPs and MEPs were implemented impacts to the resources, qualities, values, associated setting, and primary uses of the NHT would be reduced but the principal effects of the Project, the visual impact of transmission infrastructure and the potential for direct impacts from Project construction, operation, and decommissioning would remain.

6.7 Mitigation

Consistent with BLM Manual 6280, the BLM is required, to the greatest extent possible, to consider opportunities for mitigation to a level commensurate with the adverse impact to the nature and purposes; resources, qualities, values, and associated settings; and the primary use or uses of the NHT. To eliminate or moderate adverse impacts, the BLM can consider:

- Rectifying, reducing, or eliminating the impact over time and/or compensating for the impact by replacing or providing substitute resources or environments;
- On-site mitigation and design considerations can include moving the project location, minimizing the scale, camouflaging the proposed activity with visual screening techniques, or similar actions;
- Prioritizing on-site mitigation prior to considering off-site mitigation options with regional options being considered prior to statewide options; and/or
- Where on-site mitigation (along the Oregon NHT) cannot adequately compensate for an adverse impact, off-site mitigation may include consideration of monetary compensation for public lands along the Oregon NHT.

It is anticipated that mitigation measures would be implemented through site-specific HPTPs. These plans would include measures to avoid, minimize, or mitigate adverse

impacts (direct and/or indirect) to the Oregon NHT and/or the North Alternate Study Trail. In the event of unavoidable adverse impacts to the Oregon NHT and/or the North Alternate Study Trail, the Historic Property Treatment Plan may stipulate compensatory mitigation measures.

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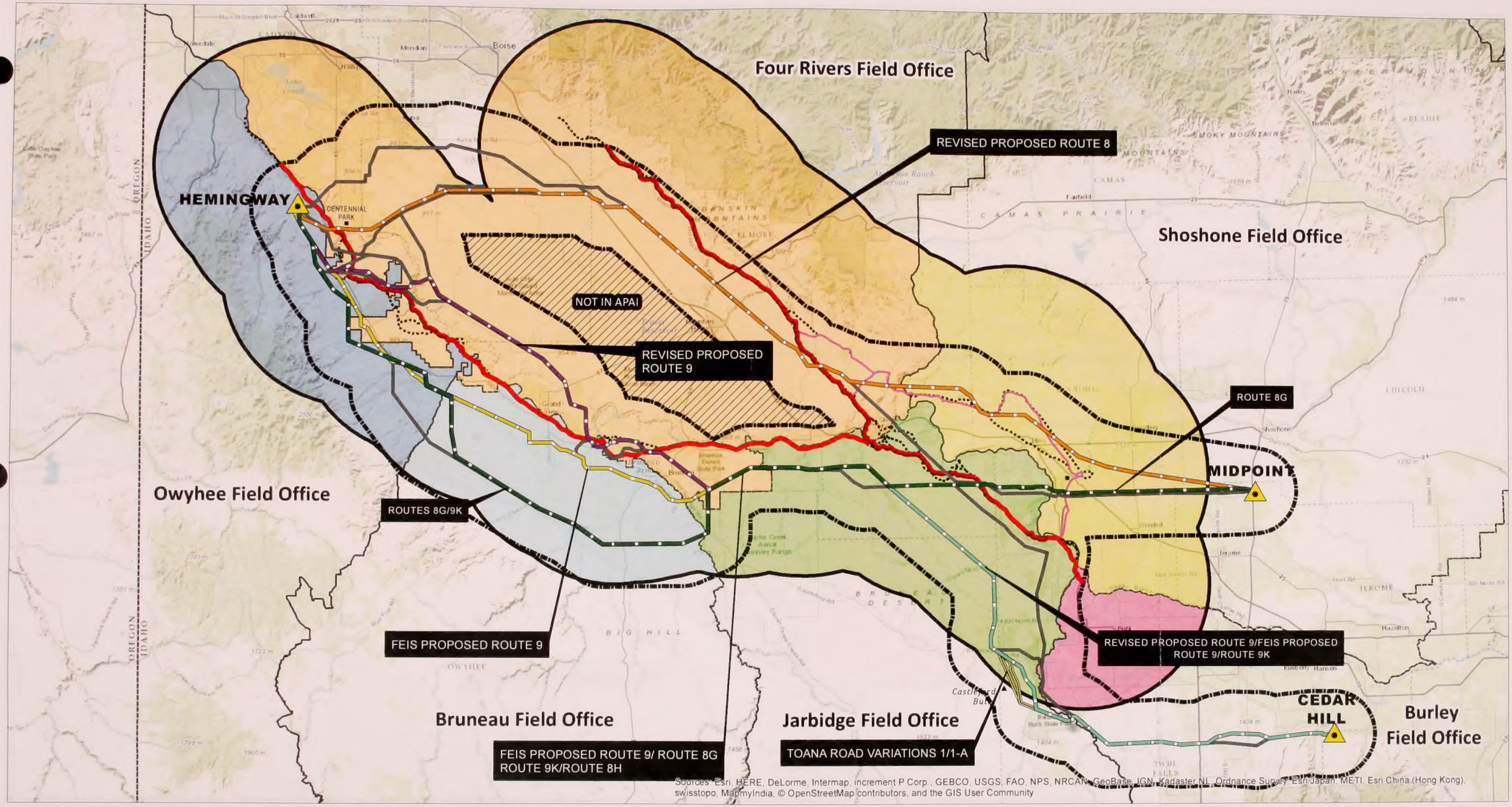
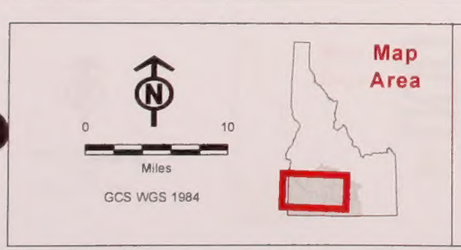
Attachment A1

Project Overview Maps





Substations
APAI Boundary
AU Boundaries

Project Features
- Route 8G
- Route 9K
- Revised Proposed Rte. 8
- Revised Proposed Rte. 9
- FEIS Proposed Route 9
- Route 8H
- Other 2013 FEIS Routes
- Toana Road Variations

Oregon Trail Features
- HPRSEG
- Oregon Trail (NHT[1])
- North Alternate Study Trail
- Associated Trail Segments (NHT[2])

BLM Field Office
- Bruneau Field Office
- Burley Field Office
- Four Rivers Field Office
- Jarbidge Field Office
- Owyhee Field Office
- Shoshone Field Office

Gateway West
Transmission Line Project
Draft Supplemental EIS

Project Overview Maps
BLM Field Offices, AU Boundaries, and APAI
Figure A1-1

Sources | BLM, Esri, Idaho Power, NPS, USFS, USGS, Ventyx

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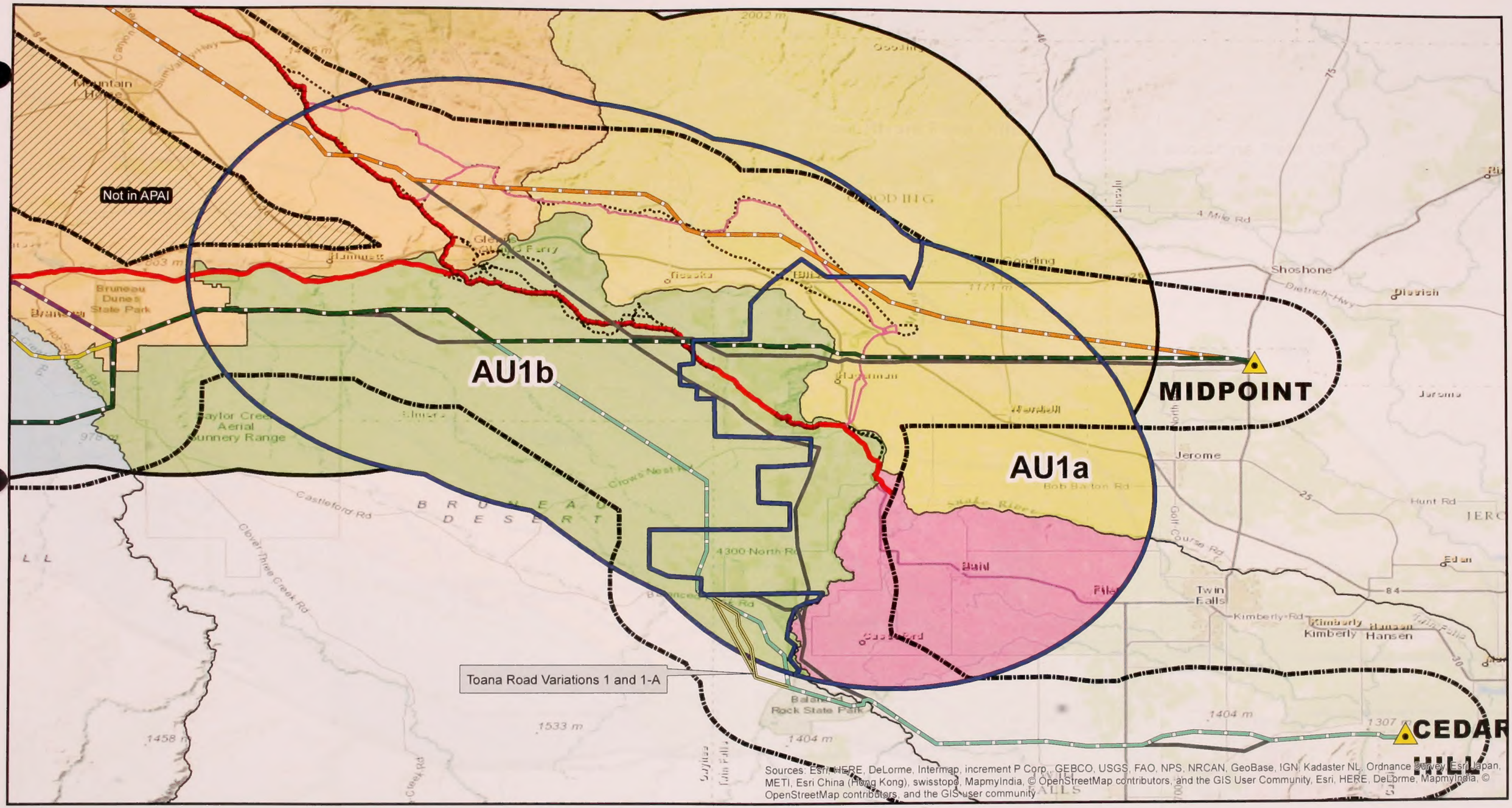

Map Area

0 5
Miles
GCS WGS 1984

AU1
APAI Boundary
AU Boundaries
Substation

Project Features
- Route 8G
- Route 9K
- Revised Proposed Rte. 8
- Revised Proposed Rte. 9
- FEIS Proposed Route 9
- Route 8H
- Other 2013 FEIS Routes
- Toana Road Variations

Oregon Trail Features
- HPRSEG
- Oregon Trail (NHT[1])
- North Alternate Study Trail
- Associated Trail Segments (NHT[2])

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- Four Rivers Field Office
- Jarbidge Field Office
- Owyhee Field Office
- Shoshone Field Office

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Draft Supplemental EIS

Project Overview Map AU1
BLM Field Offices, AU Boundaries, and APAI
Figure A1-2

Sources | BLM, Esri, Idaho Power, NPS, USFS, USGS, Ventyx

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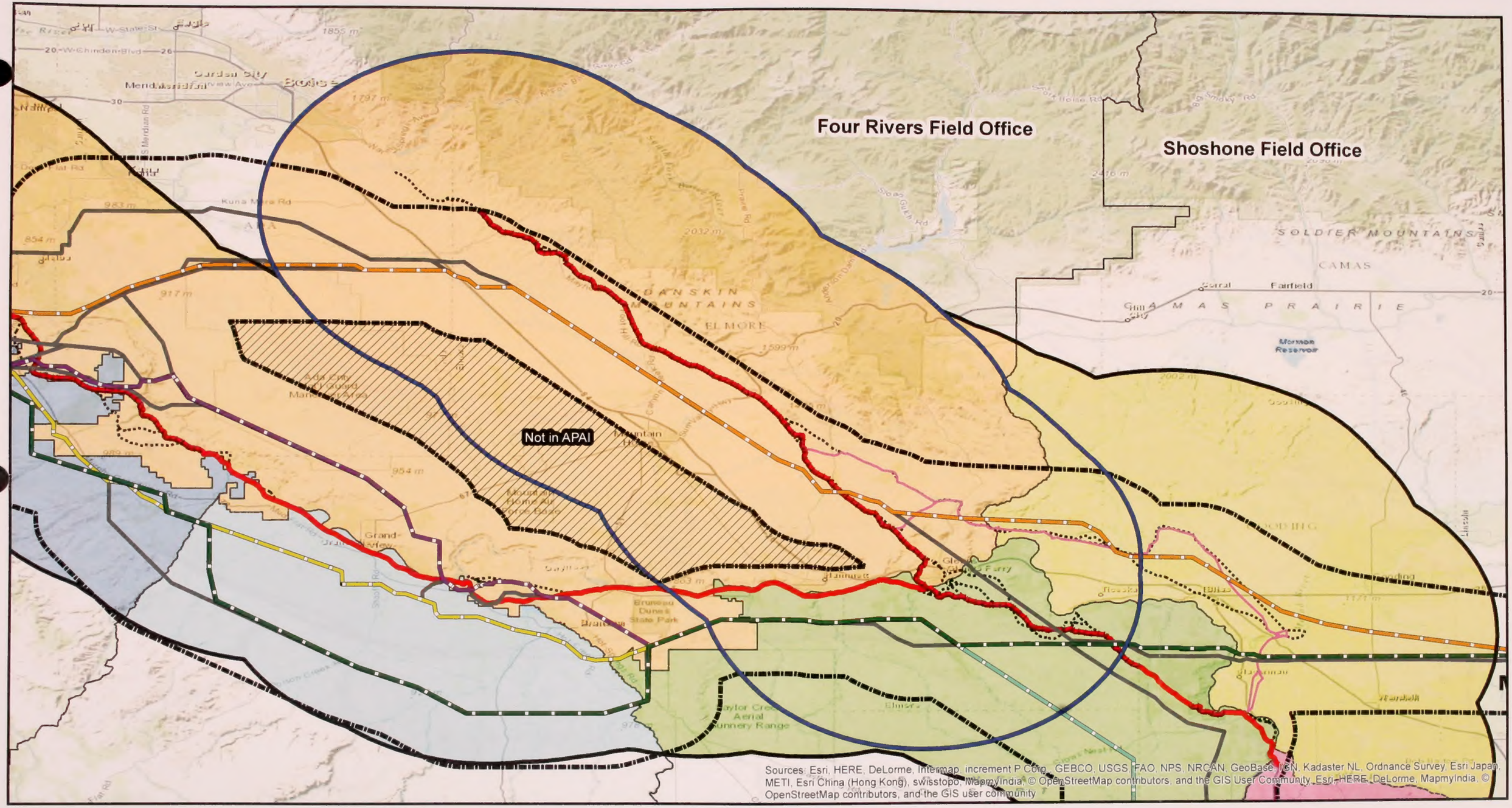

Map Area

0 5
Miles
GCS WGS 1984

AU2
APAI Boundary
AU Boundaries
Substation

Project Features
- Route 8G
- Route 9K
- Revised Proposed Rte. 8
- Revised Proposed Rte. 9
- FEIS Proposed Route 9
- Route 8H
- Other 2013 FEIS Routes

Oregon Trail Features
- HPRSEG
- Oregon Trail (NHT[1])
- North Alternate Study Trail
- Associated Trail Segments (NHT[2])

BLM Field Office
- Bruneau Field Office
- Burley Field Office
- Four Rivers Field Office
- Jarbidge Field Office
- Owyhee Field Office
- Shoshone Field Office

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Transmission Line Project
Draft Supplemental EIS

Project Overview Map AU2
BLM Field Offices, AU Boundaries, and APAI
Figure A1-3

Sources | BLM, Esri, Idaho Power, NPS, USFS, USGS, Ventyx

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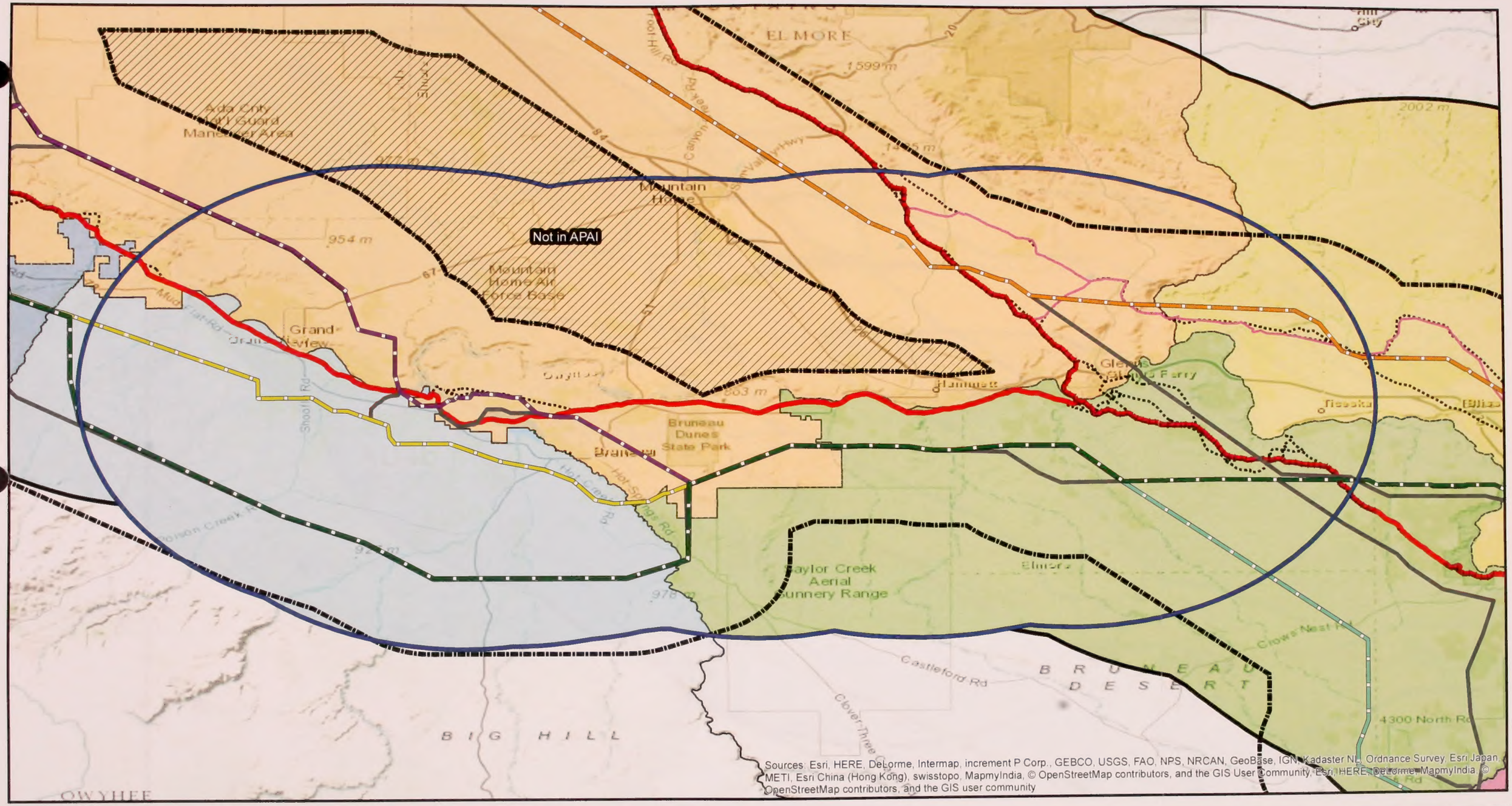

0 5
Miles
GCS WGS 1984

Map Area

AU3
APAI Boundary
AU Boundaries
Substation

Project Features
Route 8G
Route 9K
Revised Proposed Rte. 8
Revised Proposed Rte. 9
FEIS Proposed Route 9
Route 8H
Other 2013 FEIS Routes

Oregon Trail Features
HPRSEG
Oregon Trail (NHT[1])
North Alternate Study Trail
Associated Trail Segments (NHT[2])

BLM Field Office
Bruneau Field Office
Burley Field Office
Four Rivers Field Office
Jarbidge Field Office
Owyhee Field Office
Shoshone Field Office

Gateway West
Transmission Line Project
Draft Supplemental EIS

Project Overview Map AU3
BLM Field Offices, AU Boundaries, and APAI
Figure A1-4

Sources | BLM, Esri, Idaho Power, NPS, USFS, USGS, Ventyx

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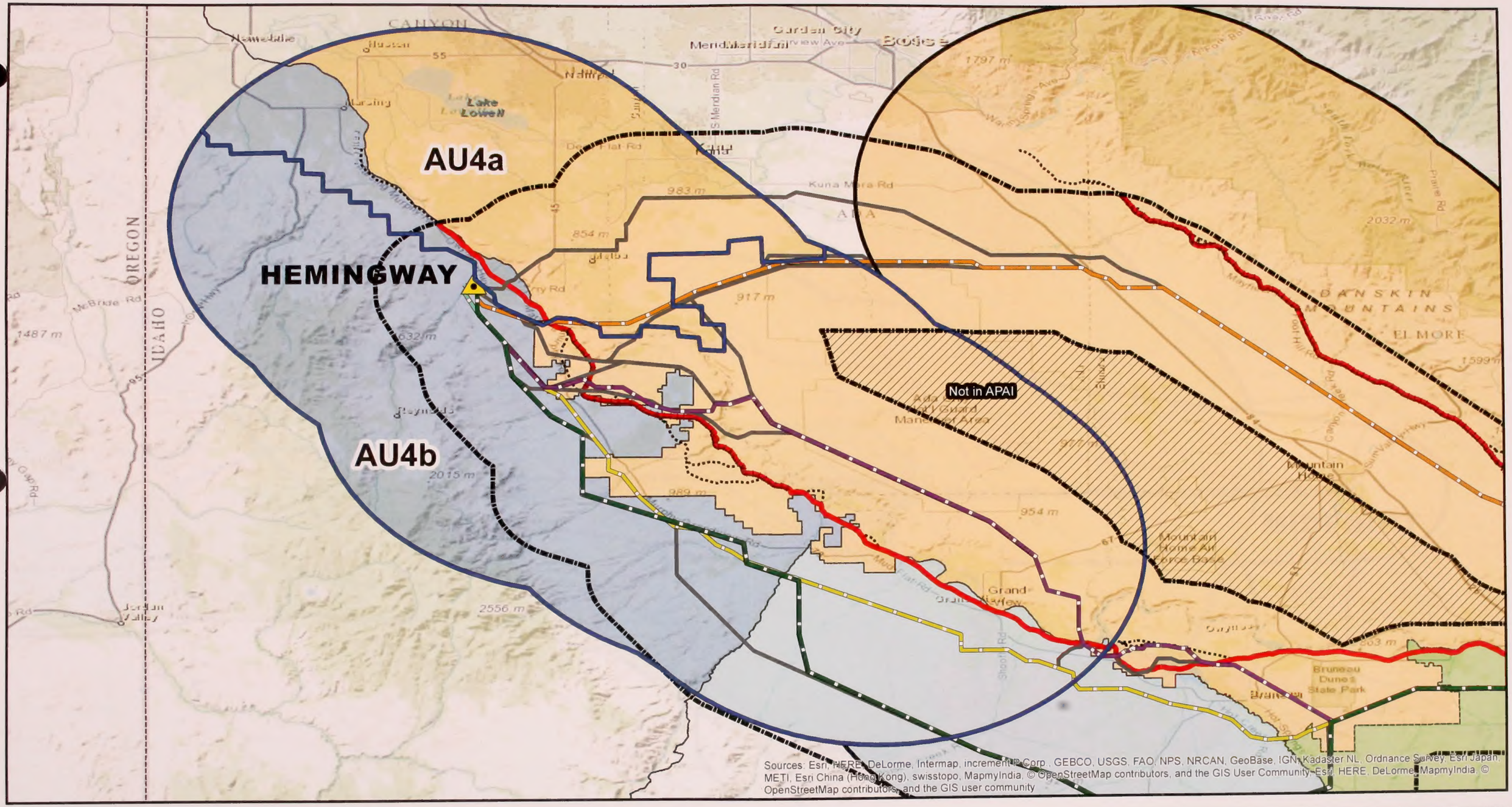

Map Area

Miles
GCS WGS 1984

AU4
APAI Boundary
AU Boundaries
Substation

Project Features

- Route 8G
- Route 9K
- Revised Proposed Rte. 8
- Revised Proposed Rte. 9
- FEIS Proposed Route 9
- Route 8H
- Other 2013 FEIS Routes

Oregon Trail Features

- HPRSEG
- Oregon Trail (NHT[1])
- North Alternate Study Trail
- Associated Trail Segments (NHT[2])

BLM Field Office

- Bruneau Field Office
- Burley Field Office
- Four Rivers Field Office
- Jarbidge Field Office
- Owyhee Field Office
- Shoshone Field Office

Gateway West
Transmission Line Project
Draft Supplemental EIS

Project Overview Map AU4
BLM Field Offices, AU Boundaries, and APAI
Figure A1-5

Sources | BLM, Esri, Idaho Power, NPS, USFS, USGS, Ventyx

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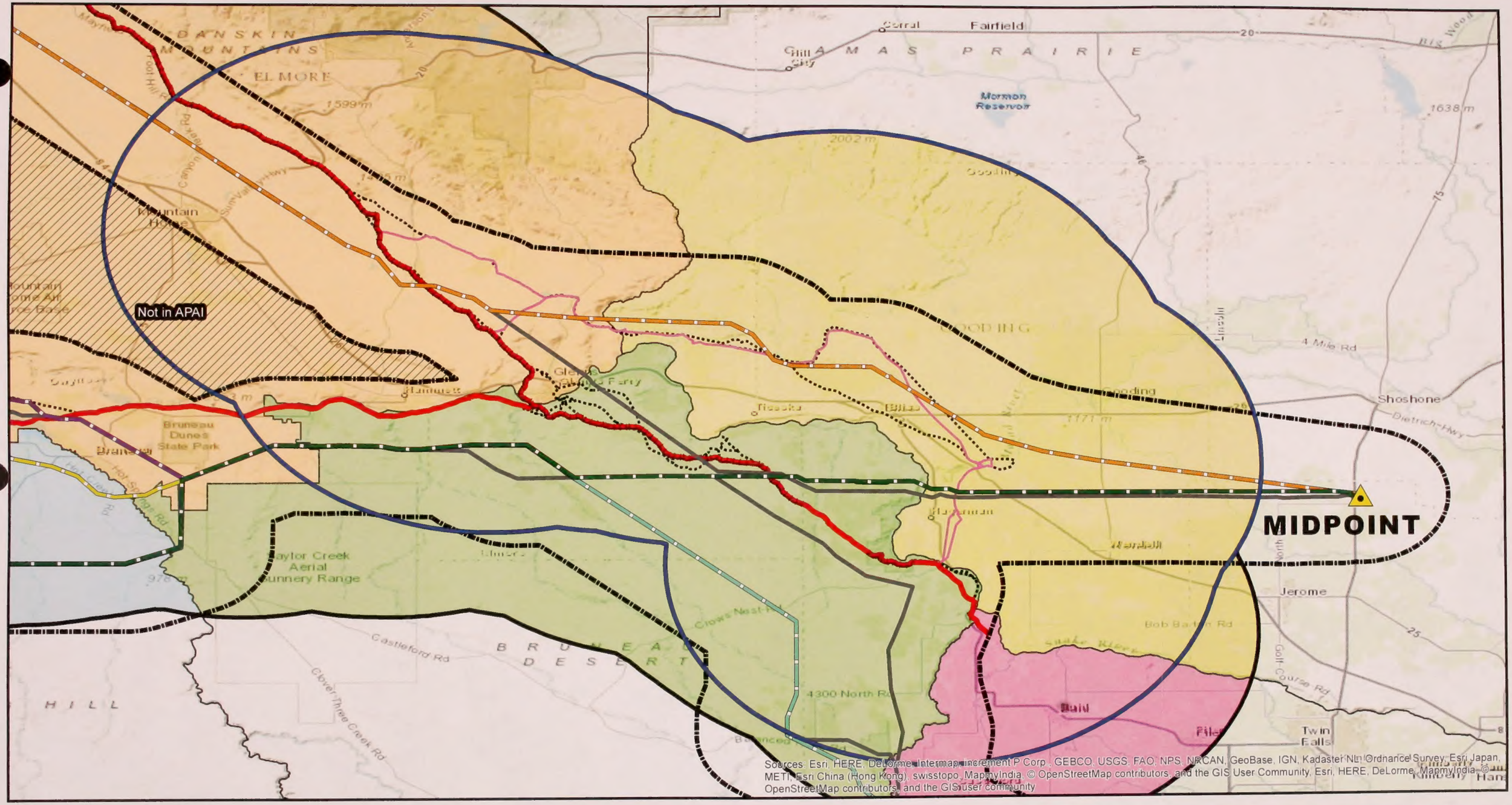

Map Area

0 5
Miles
GCS WGS 1984

AU5
APAI Boundary
AU Boundaries
Substation

Project Features
- Route 8G
- Route 9K
- Revised Proposed Rte. 8
- Revised Proposed Rte. 9
- FEIS Proposed Route 9
- Route 8H
- Other 2013 FEIS Routes

Oregon Trail Features
- HPRSEG
- Oregon Trail (NHT[1])
- North Alternate Study Trail
- Associated Trail Segments (NHT[2])

BLM Field Office
- Bruneau Field Office
- Burley Field Office
- Four Rivers Field Office
- Jarbidge Field Office
- Owyhee Field Office
- Shoshone Field Office

Gateway West
Transmission Line Project
Draft Supplemental EIS

Project Overview Map AU5
BLM Field Offices, AU Boundaries, and APAI
Figure A1-6

Sources: BLM, Esri, Idaho Power, NPS, USFS, USGS, Ventyx

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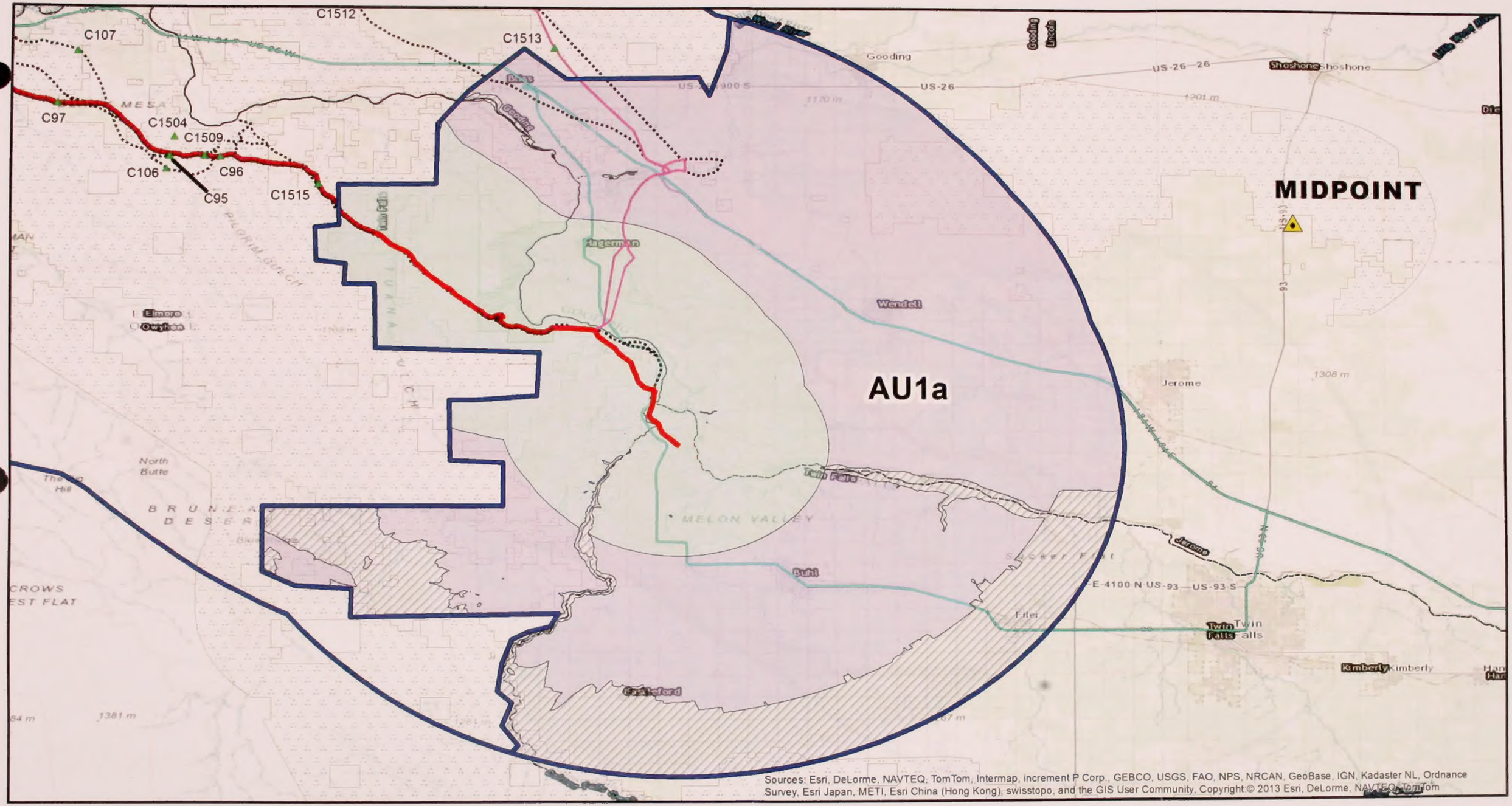
Attachment A2

Manual 6280 Inventory Maps



0 5
Miles
GCS WGS 1984

Map Area

IOPs/KOPs
AU1
Substation
BLM Land

Oregon Trail Features

HPRSEG
Oregon Trail (NHT[1])
North Alternate Study Trail
Associated Trail Segments (NHT[2])
NPS Auto Tour Route (NHT[3])

VRI Distance Zones and Classes

Foreground/Middleground 0-5Mi: VRI Class III
Background 5-15Mi: VRI Class IV
Seldom Seen/Not in View +15Mi: VRI Class IV

Gateway West
Transmission Line Project
Draft Supplemental EIS

Inventory Map AU1a
Oregon Trail Features, IOPs/KOPs, and VRI
Figure A2-1

Sources | BLM, Esri, Idaho Power, NPS, USFS, USGS, Ventyx

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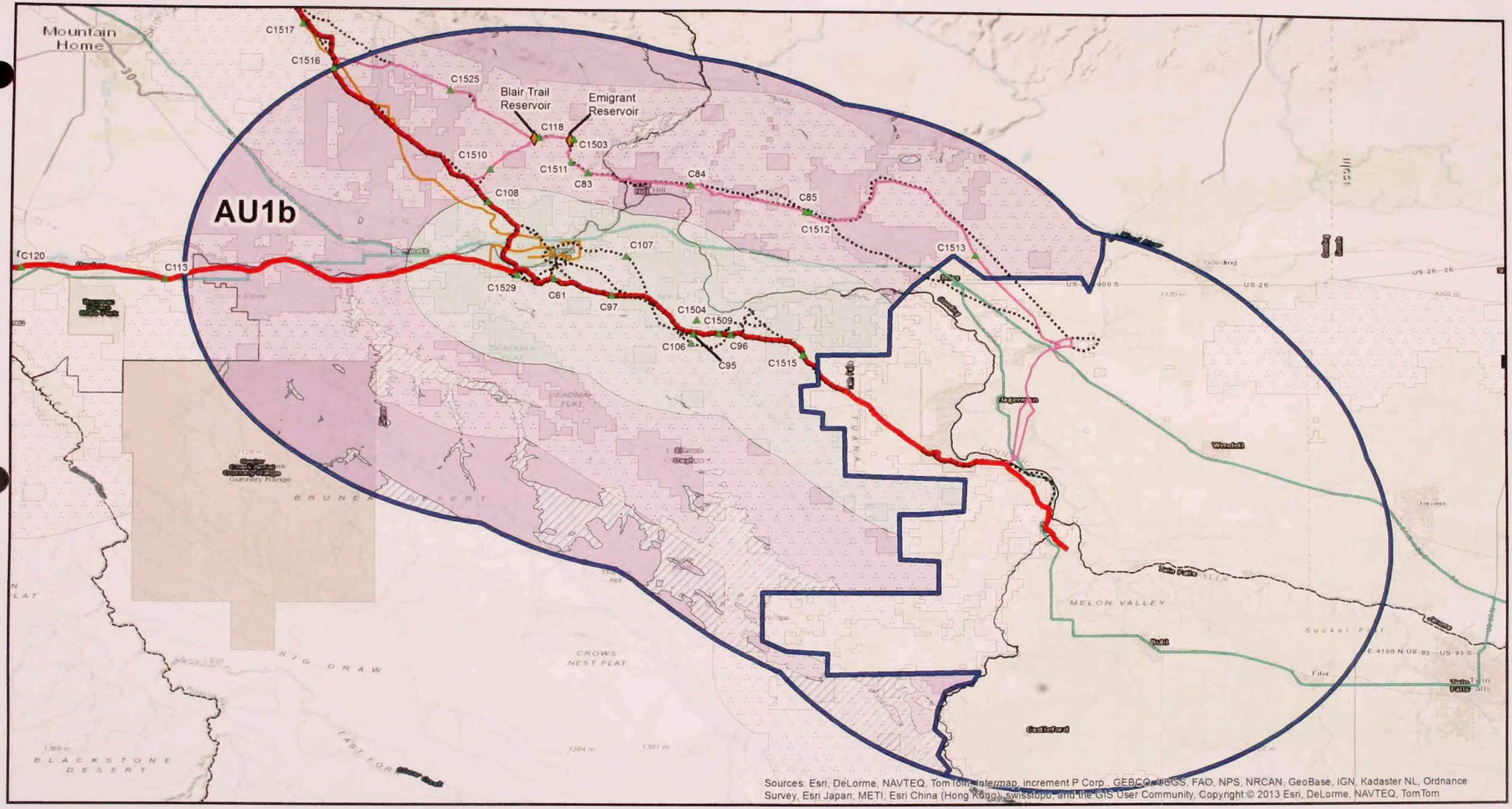

0 5
Miles
GCS WGS 1984

Map Area

IOPs/KOPs
AU1
Substation
BLM Land

Oregon Trail Features

HPRSEG
Oregon Trail (NHT[1])
North Alternate Study Trail
Associated Trail Segments (NHT[2])
NPS Auto Tour Route (NHT[3])
Recreation Sites (NHT[3])
Backcountry Byway (NHT[3])

VRI Distance Zones and Classes

Foreground/Middleground 0-5Mi: VRI Class II
Background 5-15Mi: VRI Class III
Seldom Seen/Not in View +15Mi: VRI Class III

Gateway West
Transmission Line Project
Draft Supplemental EIS

Inventory Map AU1b
Oregon Trail Features, IOPs/KOPs, and VRI
Figure A2-2

Sources | BLM, Esri, Idaho Power, NPS, USFS, USGS, Ventyx

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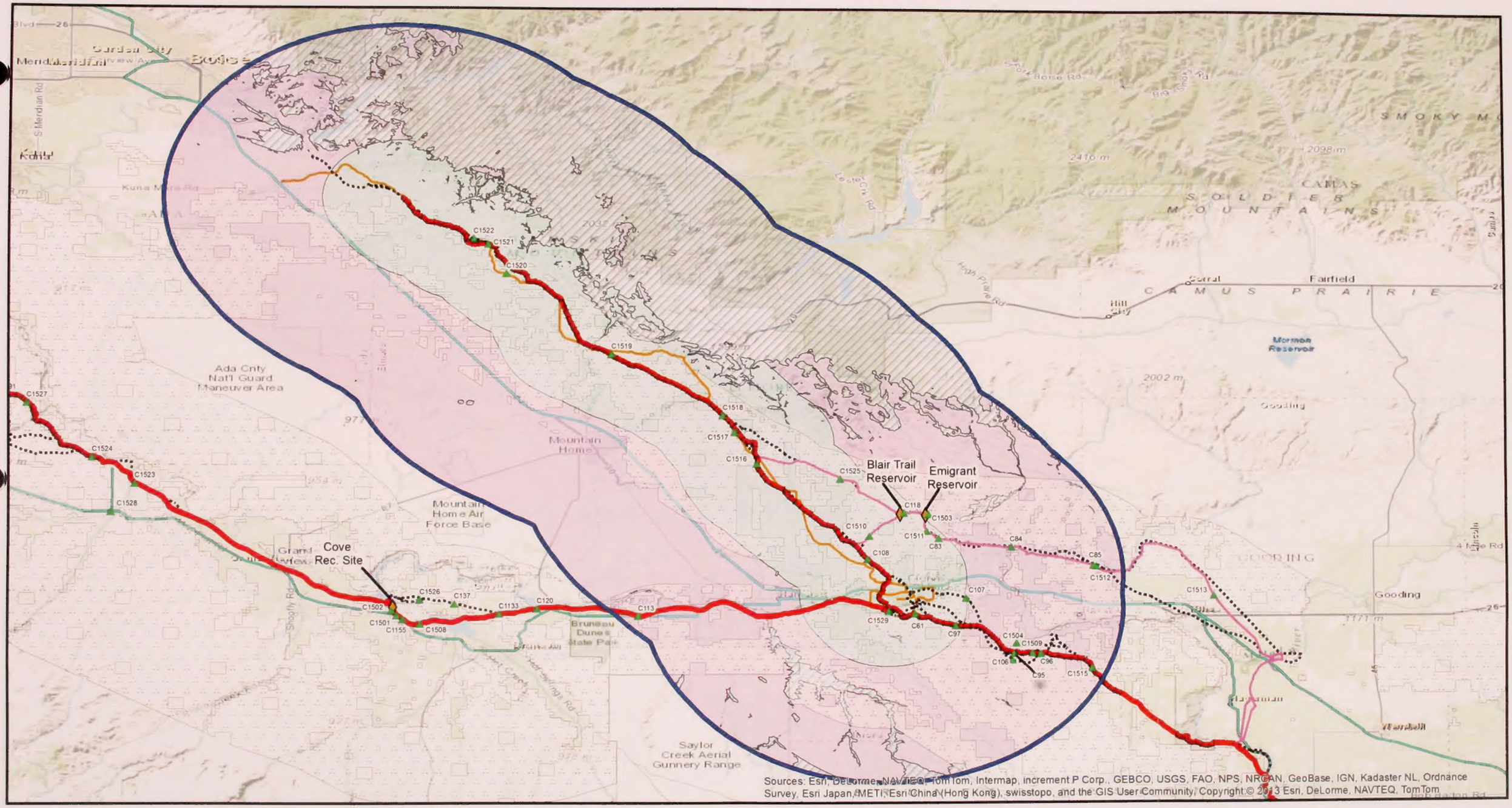

0 5
Miles
GCS WGS 1984

Map Area

Oregon Trail Features

- IOPs/KOPs
- AU2
- Substation
- BLM Land
- HPRSEG
- Oregon Trail (NHT[1])
- North Alternate Study Trail
- Associated Trail Segments (NHT[2])
- NPS Auto Tour Route (NHT[3])
- Recreation Sites (NHT[3])
- Backcountry Byway (NHT[3])

VRI Distance Zones and Classes

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- Background 5-15Mi: VRI Class IV
- Seldom Seen/Not in View +15Mi: VRI Class IV

Gateway West
Transmission Line Project
Draft Supplemental EIS

Inventory Map AU2
Oregon Trail Features, IOPs/KOPs, and VRI
Figure A2-3

Sources | BLM, Esri, Idaho Power, NPS, USFS, USGS, Ventyx

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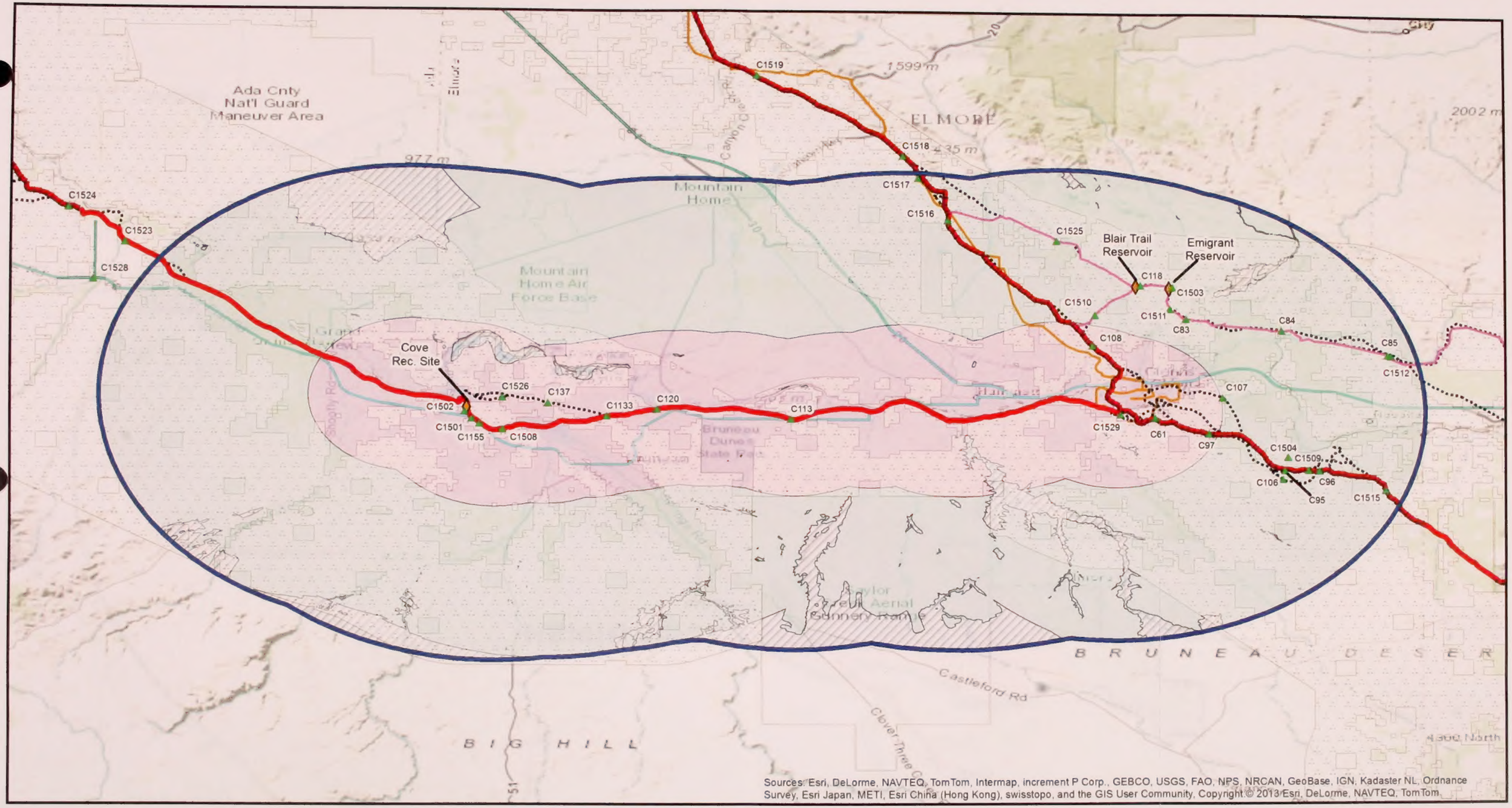

0 5
Miles
GCS WGS 1984

Map Area

Oregon Trail Features

- IOPs/KOPs
- AU3
- Substation
- BLM Land
- HPRSEG
- Oregon Trail (NHT[1])
- North Alternate Study Trail
- Associated Trail Segments (NHT[2])
- NPS Auto Tour Route (NHT[3])
- Recreation Sites (NHT[3])
- Backcountry Byway (NHT[3])

VRI Distance Zones and Classes

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- Background 5-15Mi: VRI Class II
- Seldom Seen/Not in View +15Mi: VRI Class II

Gateway West
Transmission Line Project
Draft Supplemental EIS

Inventory Map AU3
Oregon Trail Features, IOPs/KOPs, and VRI
Figure A2-4

Sources | BLM, Esri, Idaho Power, NPS, USFS, USGS, Ventyx

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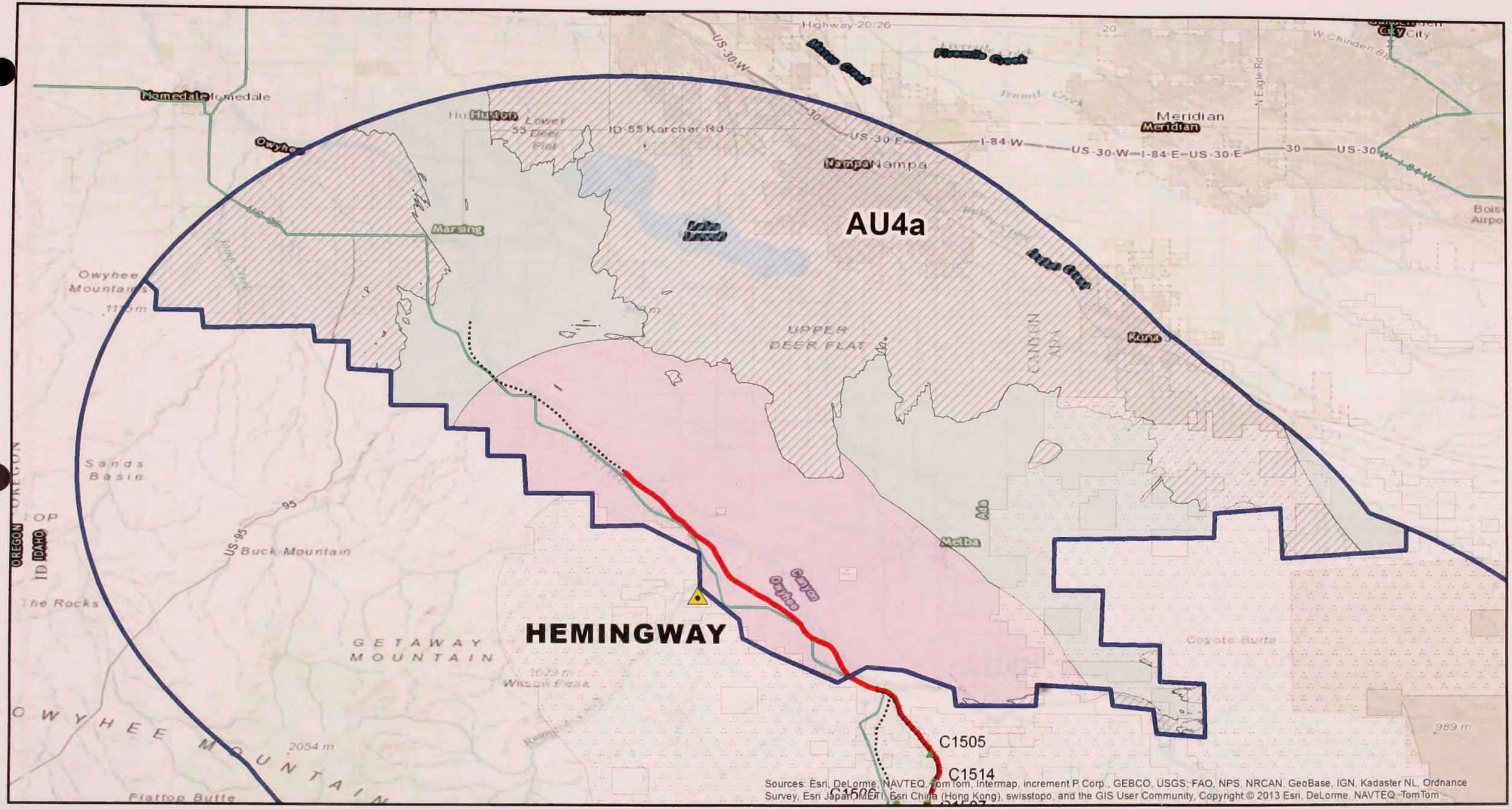

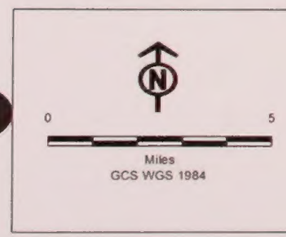

IOPs/KOPs
AU4
Substation
BLM Land

Oregon Trail Features

HPRSEG
Oregon Trail (NHT[1])
North Alternate Study Trail
Associated Trail Segments (NHT[2])
NPS Auto Tour Route (NHT[3])

VRI Distance Zones and Classes

Foreground/Middleground 0-5Mi: VRI Class II
Background 5-15Mi: VRI Class III
Seldom Seen/Not in View +15Mi: VRI Class III

Gateway West
Transmission Line Project
Draft Supplemental EIS

Inventory Map AU4a
Oregon Trail Features, IOPs/KOPs, and VRI
Figure A2-5

Sources | BLM, Esri, Idaho Power, NPS, USFS, USGS, Ventyx

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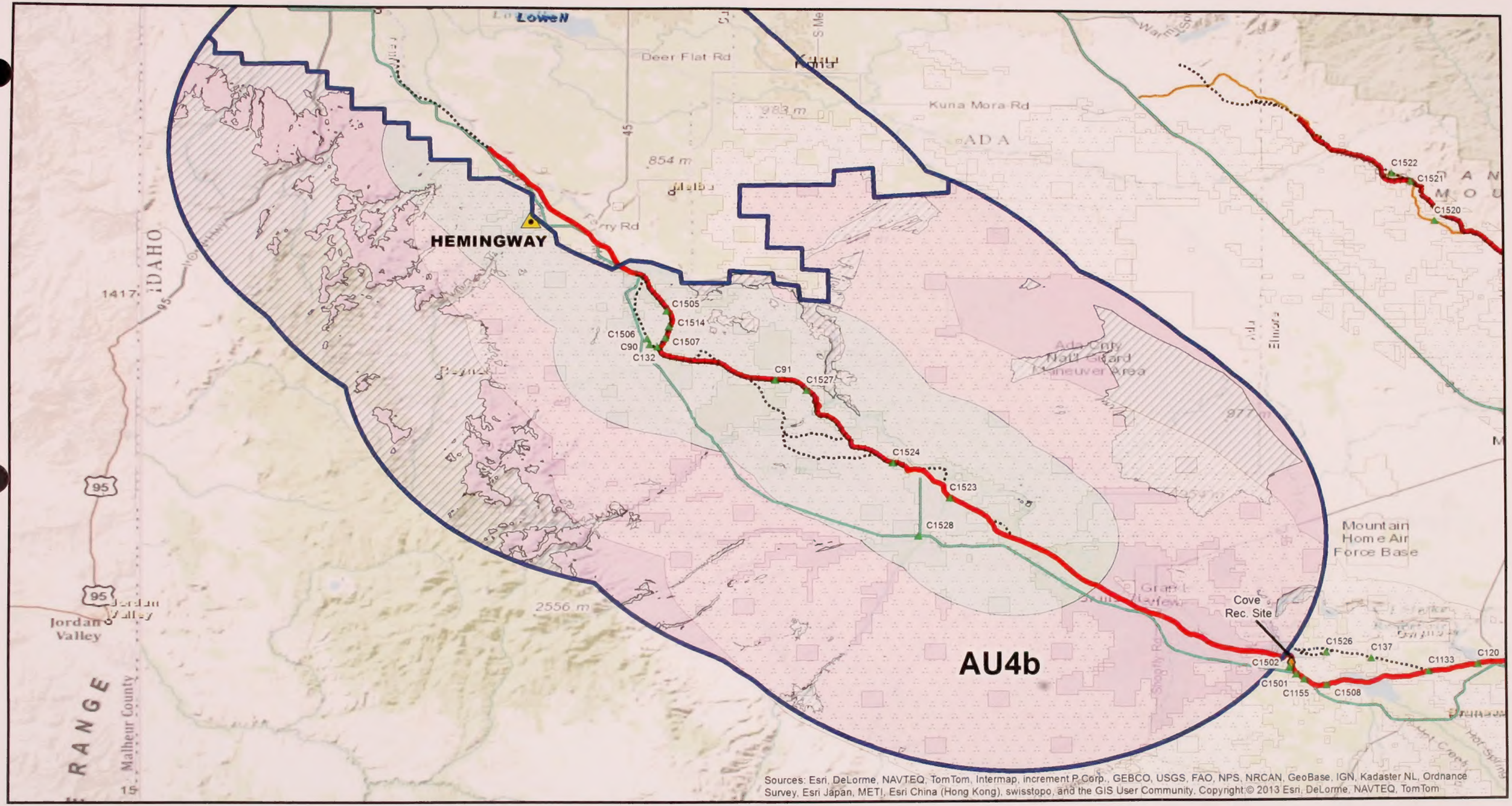
HEMINGWAY
AU4b
C1505
C1514
C1506
C1507
C90
C132
C91
C1527
C1524
C1523
C1528
C1522
C1521
C1520
C1526
C137
C1133
C120
C1502
C1501
C1155
C1508
Cove
Rec. Site
Deer Flat Rd
Kuna Mora Rd
ADA
IDAHO
Jordan Valley
Mountain Home Air Force Base
Malheur County
Sources: Esri, DeLorme, NAVTEQ, TomTom, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, and the GIS User Community. Copyright © 2013 Esri, DeLorme, NAVTEQ, TomTom
Map Area
0 5
Miles
GCS WGS 1984
IOPs/KOPs
AU4
Substation
BLM Land
Oregon Trail Features
HPRSEG
Oregon Trail (NHT1)
North Alternate Study Trail
Associated Trail Segments (NHT2)
NPS Auto Tour Route (NHT3)
Recreation Sites (NHT3)
Backcountry Byway (NHT3)
VRI Distance Zones and Classes
Foreground/Middleground 0-5Mi: VRI Class II
Background 5-15 Mi: VRI Class II
Seldom Seen/Not in View +15Mi: VRI Class II
Gateway West
Transmission Line Project
Draft Supplemental EIS
Inventory Map AU4b
Oregon Trail Features, IOPs/KOPs, and VRI
Figure A2-6
Sources | BLM, Esri, Idaho Power, NPS, USFS, USGS, Ventyx
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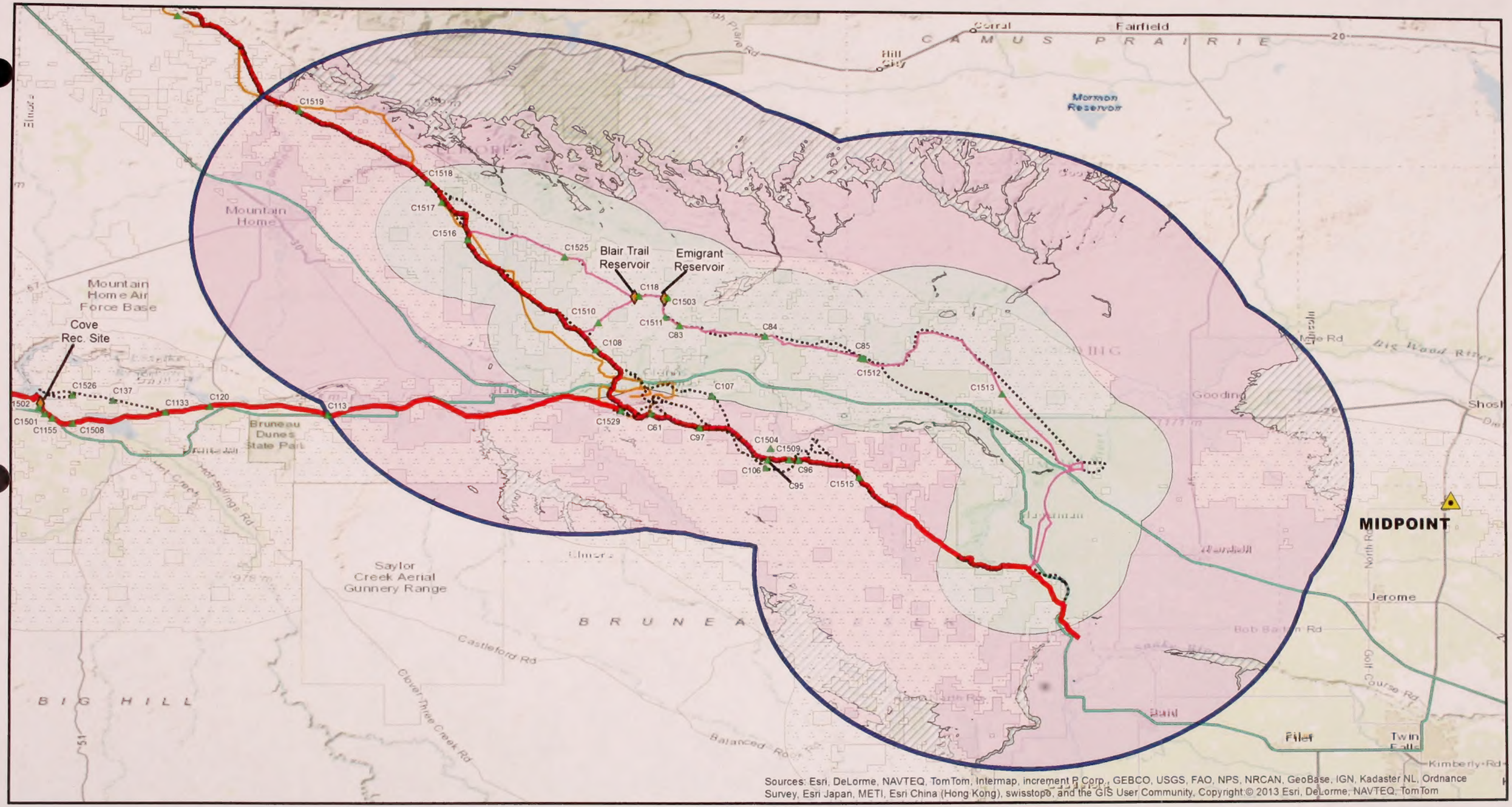

N

0 5
Miles
GCS WGS 1984

Map Area

IOPs/KOPs
AU5
Substation
BLM Land

Oregon Trail Features

HPRSEG
Oregon Trail (NHT[1])
North Alternate Study Trail
Associated Trail Segments (NHT[2])
NPS Auto Tour Route (NHT[3])
Recreation Sites (NHT[3])
Backcountry Byway (NHT[3])

VRI Distance Zones and Classes

Foreground/Middleground 0-5Mi: VRI Class III
Background 5-15Mi: VRI Class IV
Seldom Seen/Not in View +15Mi: VRI Class IV

Gateway West
Transmission Line Project
Draft Supplemental EIS

Inventory Map AU5

Oregon Trail Features, IOPs/KOPs, and VRI

Figure A2-7

Sources | BLM, Esri, Idaho Power, NPS, USFS, USGS, Ventyx

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Attachment B
IOP-KOP Photographic Overviews

ATTACHMENT B. PHOTOGRAPHS OF OREGON TRAIL KOPS

Analysis Unit 1: Oregon NHT (Primary Route)

KOP C106

Figure 1. Oregon National Historic Trail KOP C106,Trail Marker near Bell Rapids Road, facing northeast.

KOP C107

Figure 2. Oregon National Historic Trail KOP C107, Kelton Road Marker, facing southwest.

KOP C108

Figure 3. Oregon National Historic Trail KOP C108, Trail Marker off Bennett Mountain Road, facing west.

KOP C61

Figure 4. Oregon National Historic Trail KOP C61, Swale, facing southwest.

KOP C95

Figure 5. Oregon National Historic Trail KOP C95, West Deer Creek Gulch, facing east-southeast.

KOP C96

Figure 6. Oregon National Historic Trail KOP C96, Portion of trail that coincides with Kelton Road, facing east.

KOP C97

Figure 7. Oregon National Historic Trail, KOP C97, Rosevear Gulch area, facing west.

KOP C1504

Figure 8. Oregon Trail KOP C1504 (GW 380-1), alternate trail segment identified on USGS map, facing southwest.

KOP C1509

Figure 9. Oregon National Historic Trail KOP C1509, Segment 8A Trail Crossing, facing south-southeast.

KOP C1515

Figure 10. Oregon National Historic Trail KOP C1515, Segment 8G trail crossing, facing west.

Analysis Unit 2: Oregon NHT (North Trail Primary Route)

KOP C108

Figure 11. Oregon National Historic Trail North Route KOP C108, Marker off Bennett Mountain Road, facing west.

KOP C1516

Figure 12. Oregon National Historic Trail North Route KOP C1516, Alkali Springs historic camping area, facing east-southeast

KOP C1517

Figure 13. Oregon National Historic Trail North Route KOP C1517, Kelton Road – Hot Springs Creek, facing east.

KOP C1518

Figure 14. Oregon National Historic Trail North Route KOP C1518, Kelton Road parallels Oregon Trail segment, facing east.

KOP C1519

Figure 15. Oregon National Historic Trail North Route KOP C1519, Rocky Road Hiking Area and Trail Ruts, facing east.

KOP C1520

Figure 16. Oregon National Historic Trail North Route KOP C1520, Interpretive sign and visible ruts, facing east..

KOP C1521

Figure 17. Oregon National Historic Trail North Route KOP C1521, Main Oregon Trail Backcountry Byway route parallels ONHT, facing southwest.

KOP C1522

Figure 18. Oregon National Historic Trail North Route KOP C1522, Inscription Point facing east.

Analysis Unit 3: Oregon NHT (South Alternate) – C.J. Strike Area

KOP C120

Figure 19. Oregon National Historic Trail South Alternate KOP C120, Swale near Snake River lobe of C.J. Strike Reservoir, facing northeast.

KOP C113

Figure 20. Oregon National Historic Trail South Alternate KOP C113, swale and ruts, facing east.

KOP C1501

Figure 21. Oregon National Historic Trail South Alternate KOP C1501, C.J. Strike Ruts, facing west.

KOP C1502

Figure 22. Oregon National Historic Trail South Alternate KOP C1502, Cove at C.J. Strike Reservoir, facing west.

KOP C1133

Figure 23. Oregon National Historic Trail South Alternate KOP C1133, Crane Falls Road, facing west.

KOP C1155

Figure 24. Oregon National Historic Trail South Alternate KOP C1155, Entrance to Cove Recreation Site, facing northwest.

KOP C137

Figure 25. Oregon National Historic Trail South Alternate KOP C137, Segment 9 Trail Crossing at Tindall Road, facing west.

KOP C1508

Figure 26. Oregon National Historic Trail South Alternate KOP C1508, Segment 9D Trail Crossing near C.J. Strike Reservoir, facing northeast.

KOP C1526

Figure 27. Oregon National Historic Trail South Alternate KOP C1526, north side of C.J. Strike Reservoir near Segment 9, facing east.

Analysis Unit 4: Oregon NHT (South Alternate – Sinker Creek Segment)

KOP C90

Figure 28. Oregon National Historic Trail South Alternative KOP C90, Trail Marker within Snake River Birds of Prey area

KOP C91

Figure 29. Oregon National Historic Trail South Alternate KOP C91, Sinker Butte Area, facing northeast.

KOP C132

Figure 30. Oregon National Historic Trail South Alternate KOP C132, Segment 9 trail crossing, facing west.

KOP C1505

Figure 31. Oregon National Historic Trail South Alternate KOP C1505, Trail Marker at Segment 8 trail crossing, facing northwest.

KOP C1506

Figure 32. Oregon National Historic Trail South Alternative KOP C1506, Segment 9D trail crossing, facing east.

KOP C1507

Figure 33. Oregon National Historic Trail South Alternative KOP C1507, near Sinker Creek at Segment 9G trail crossing, facing northwest.

KOP C1514

Figure 34. Oregon National Historic Trail South Alternative KOP C1514, Segment 9 trail crossing, facing west.

KOP C1523

Figure 35. Oregon National Historic Trail South Alternate KOP C1523, Castle Butte, facing north-northwest.

KOP C1524

Figure 36. Oregon National Historic Trail South Alternate KOP C1524, Wild Horse Butte, facing west.

KOP C1527

Figure 37. Oregon National Historic Trail South Alternate KOP C1527, Sinker Creek Butte, facing northwest.

KOP C1528

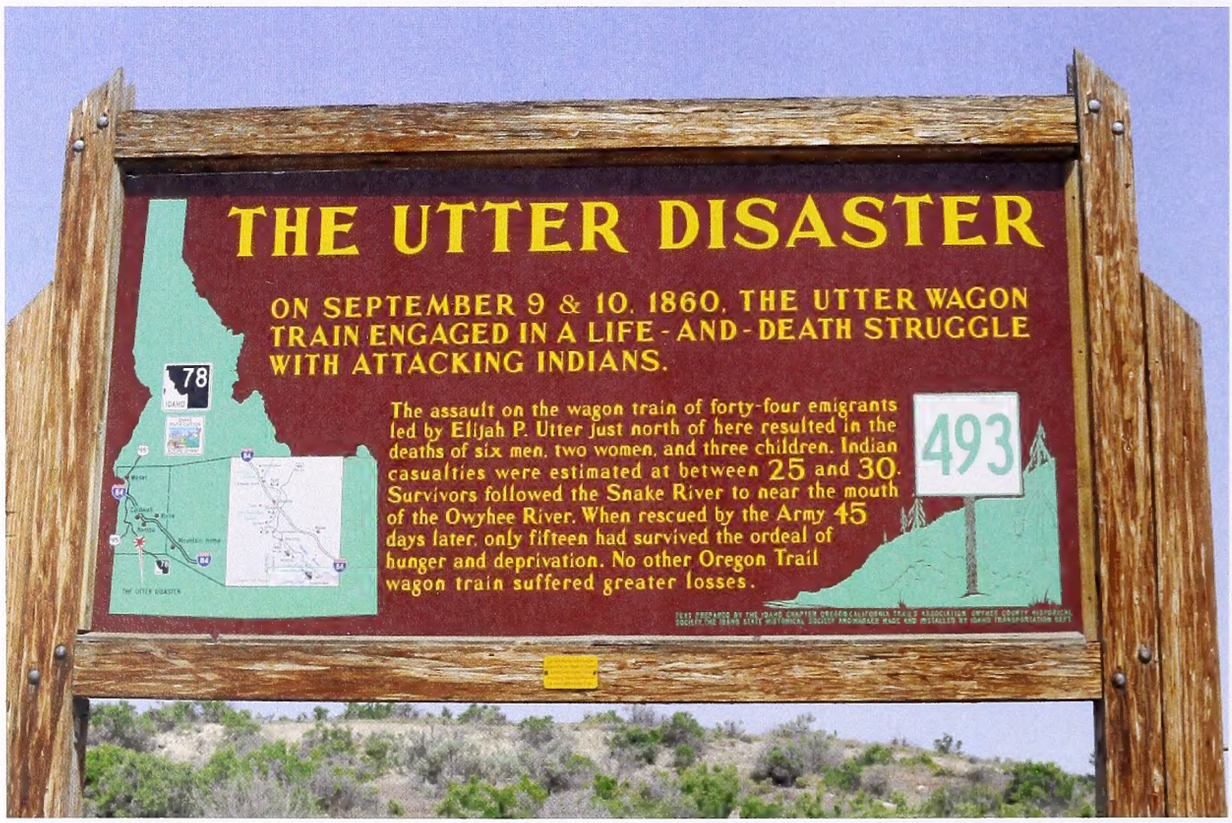


Figure 38. Oregon National Historic Trail Auto Tour Route (Hwy 78) KOP C1528, Utter Disaster Interpretive Panel, facing north.

Analysis Unit 5: Oregon Trail North Alternate Study Trail

KOP C118

Figure 39. Oregon Trail North Alternate Study Trail KOP C118, south side of Blair Trail Reservoir, facing east.

KOP C83

Figure 40. Oregon Trail North Alternate Study Trail KOP C83, Canyon Creek near Stage Station, facing north-northeast.

KOP C84

Figure 41. Oregon Trail North Alternate Study Trail KOP C84, King Hill, facing west.

KOP C85

Figure 42. Oregon Trail North Alternate Study Trail KOP C85, Pioneer Reservoir, facing north.

KOP C1503

Figure 43. Oregon Trail North Alternate Study Trail KOP C1503, near Emigrant Reservoir, facing east.

KOP C1510

Figure 44. Oregon Trail North Alternate Study Trail KOP C1510, Segment 8A trail crossing, facing south.

KOP C1511

Figure 45. Oregon Trail North Alternate Study Trail KOP C1511, Segment 8 trail crossing, facing south.

KOP C1512

Figure 46. Oregon Trail North Alternate Study Trail KOP C1512, Segment 8 trail crossing near Pioneer Reservoir, facing southeast.

KOP C1513

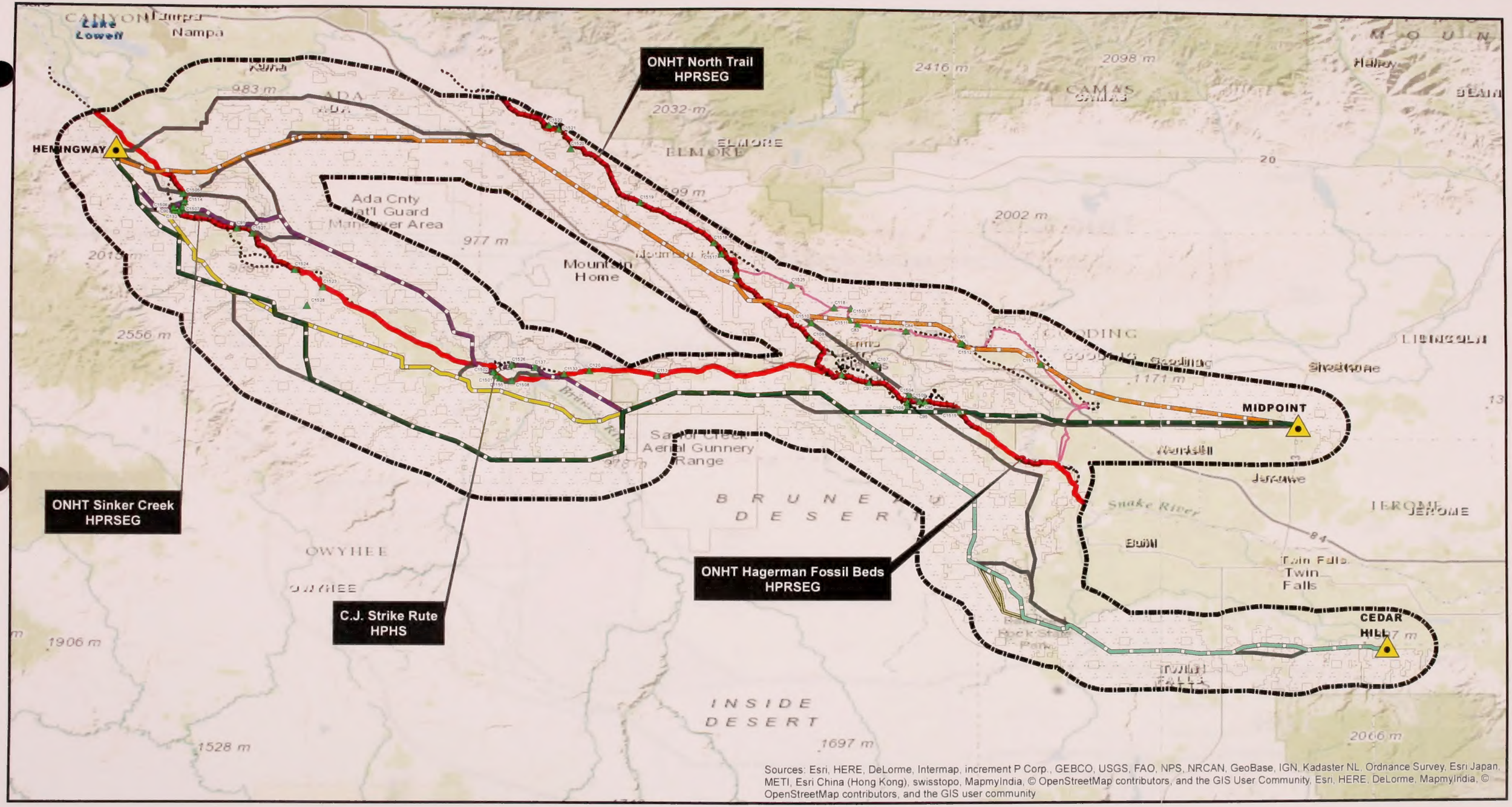
Figure 47. Oregon Trail North Alternate Study Trail KOP C1513, Segment 8 trail crossing, facing northwest.

KOP C1525

Figure 48. Oregon Trail North Alternate Study Trail KOP C1525, segment between Bennett Creek and Cold Springs, facing north.

Attachment C

Impact Maps



Sources: Esri, HERE, DeLorme, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, MapmyIndia, © OpenStreetMap contributors, and the GIS User Community, Esri, HERE, DeLorme, MapmyIndia, © OpenStreetMap contributors, and the GIS user community

0 5
Miles
GCS WGS 1984

Map Area

Oregon Trail Features
- HPRSEG
- Oregon Trail (NHT[1])
- North Alternate Study Trail
- Associated Trail Segments (NHT[2])

- KOPs
- APAI Boundary
- BLM Land
- Substation

Project Features
- Alternative 8G
- Alternative 9K
- Segment 8 Rev. Prop. Rte.
- Segment 9 Rev. Prop. Rte.
- FEIS Proposed Route 9
- Route 8H
- Other 2013 FEIS Routes
- Toana Road Variations

Gateway West
Transmission Line Project
Draft Supplemental EIS

Impacts Map Overview

OR TR. Feats., KOPs, Project Feats., and VRI

Figure C-1

Sources | BLM, Esri, Idaho Power, NPS, USFS, USGS, Ventyx

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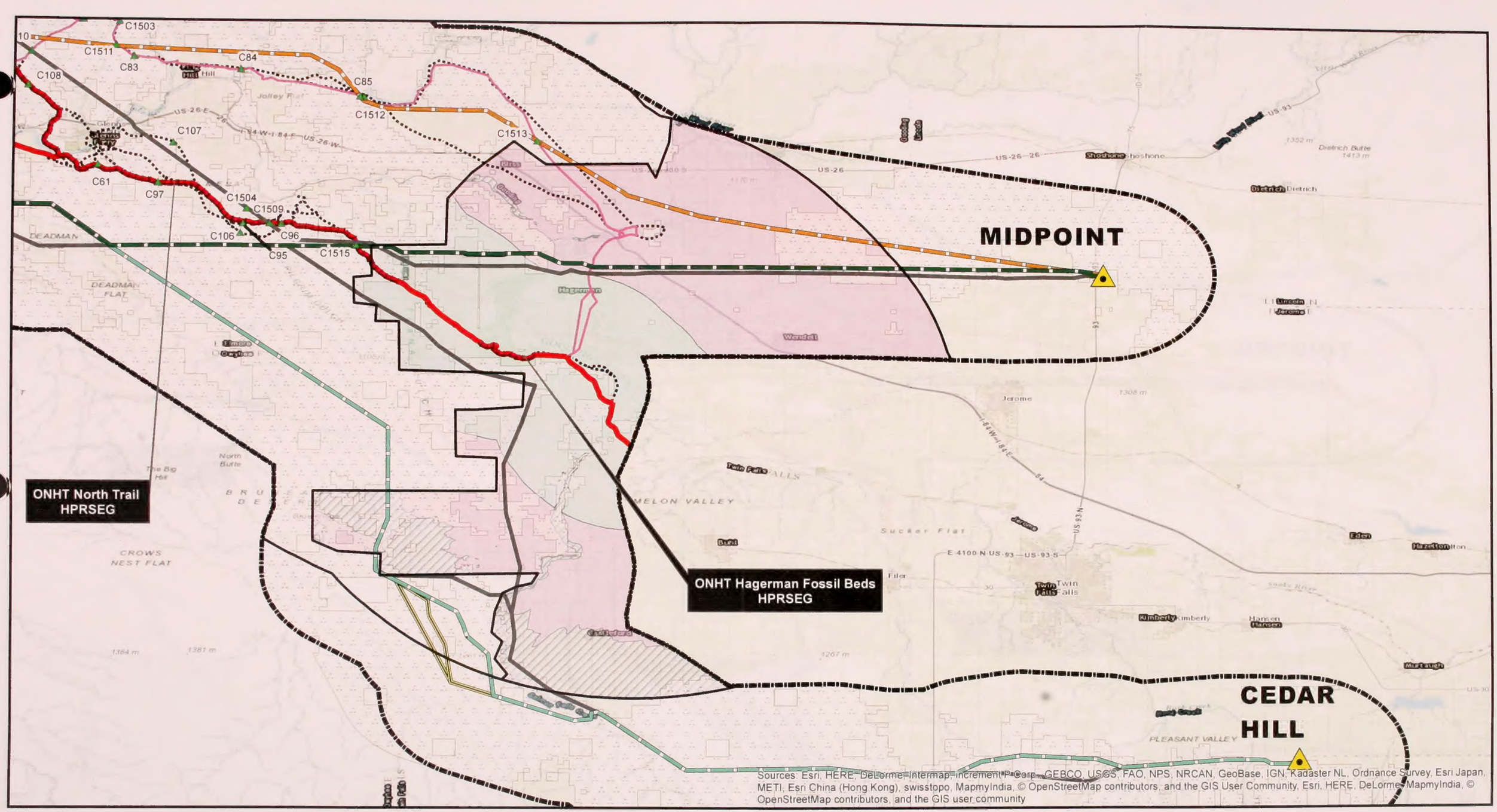

Map Area

0 5
Miles
GCS WGS 1984

Oregon Trail Features
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- Oregon Trail (NHT[1])
- North Alternate Study Trail
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VRI Distance Zones and Classes
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Gateway West
Transmission Line Project
Draft Supplemental EIS

Impacts Map AU1a
OR TR. Feats., KOPs, Project Feats., and VRI

Figure C-2

Sources | BLM, Esri, Idaho Power, NPS, USFS, USGS, Ventyx

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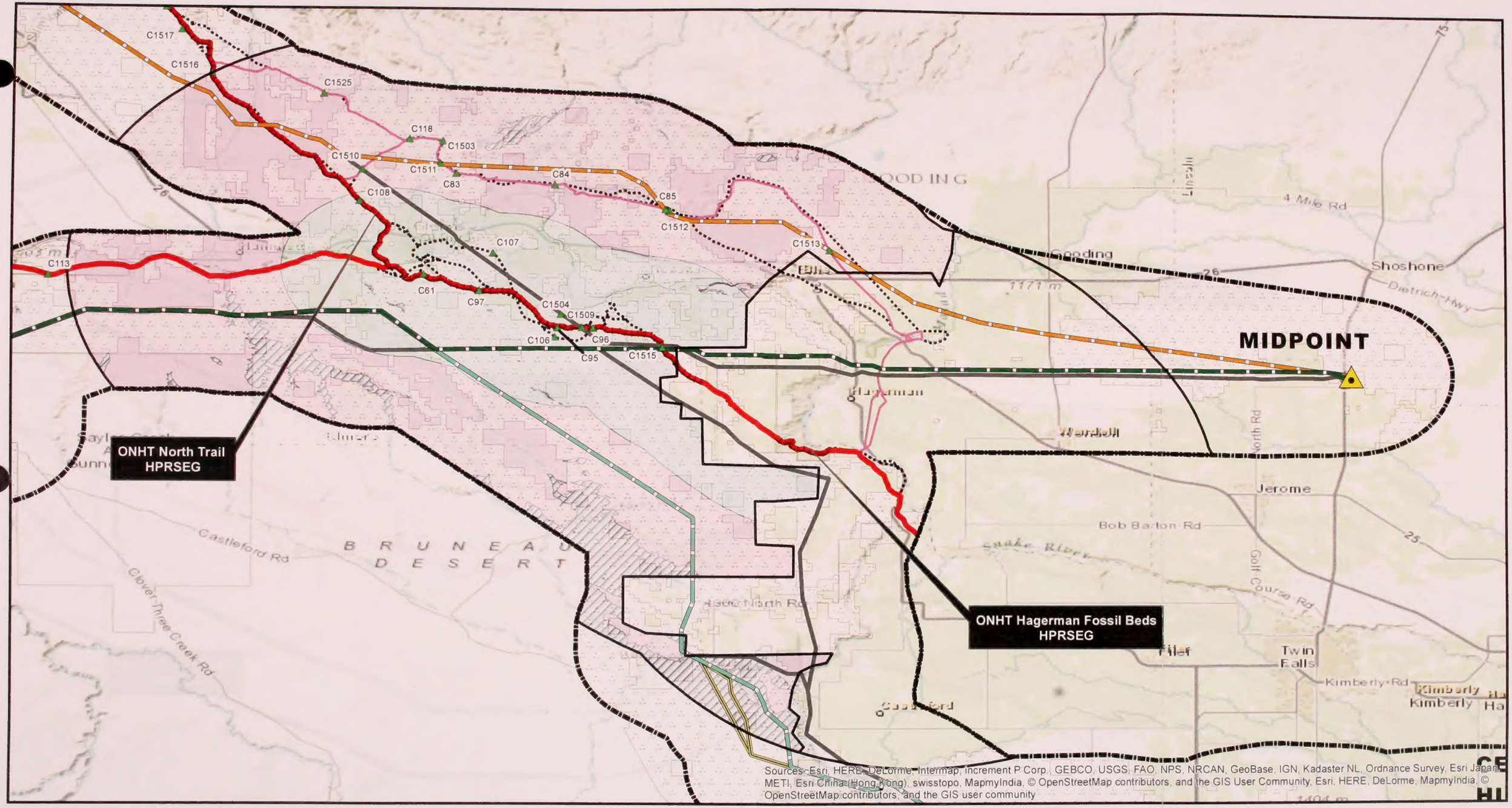

Map Area

0 5
Miles
GCS WGS 1984

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Gateway West
Transmission Line Project
Draft Supplemental EIS

Impacts Map AU1b
OR TR. Feats., KOPs, Project Feats., and VRI

Figure C-3

Sources | BLM, Esri, Idaho Power, NPS, USFS, USGS, Ventyx

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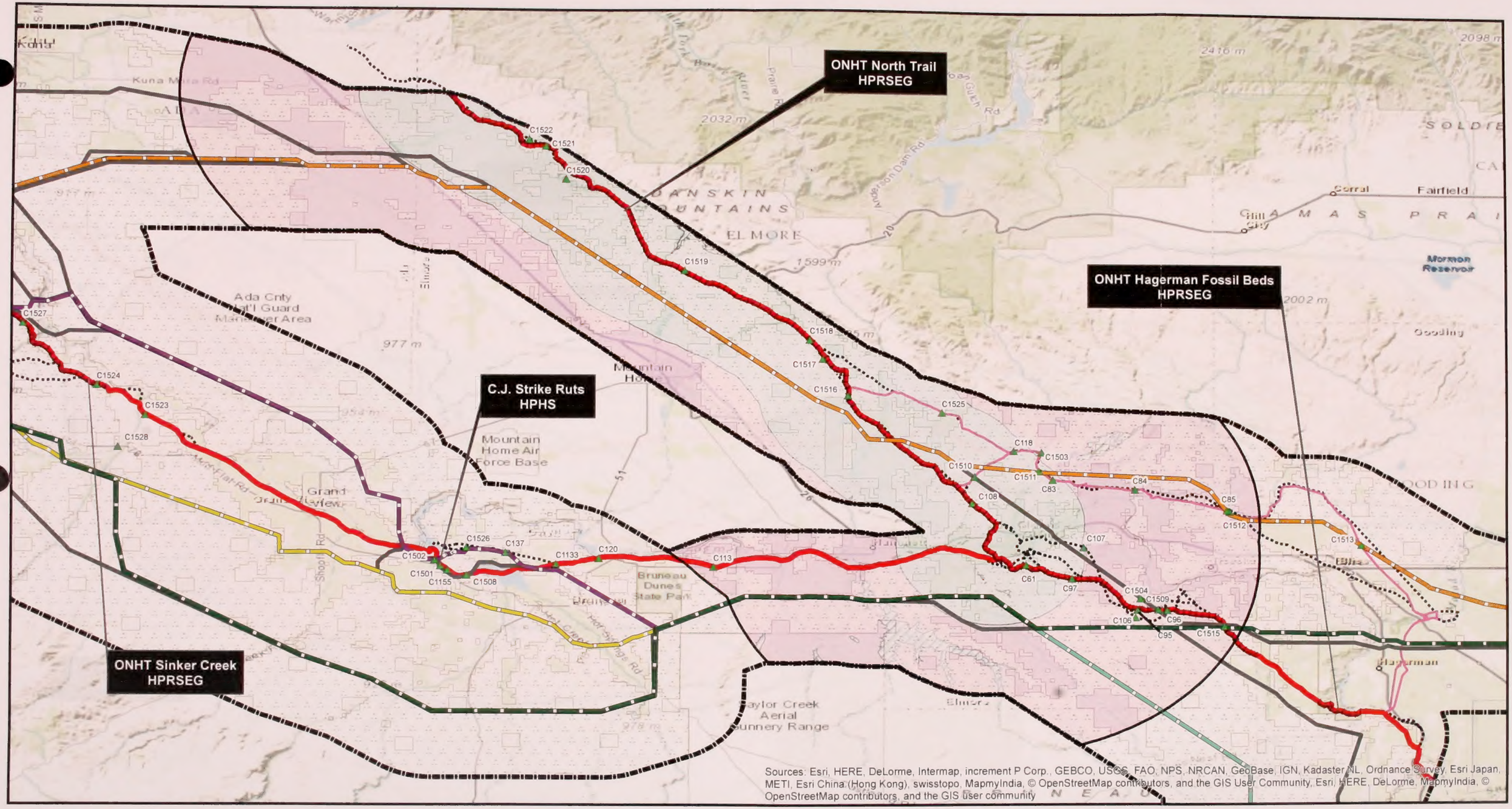

Map Area

0 5
Miles
GCS WGS 1984

Oregon Trail Features
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- North Alternate Study Trail
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- KOPs
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- Substation

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Gateway West
Transmission Line Project
Draft Supplemental EIS

Impacts Map AU2
OR TR. Feats., KOPs, Project Feats., and VRI

Figure C-4

Sources | BLM, Esri, Idaho Power, NPS, USFS, USGS, Ventyx

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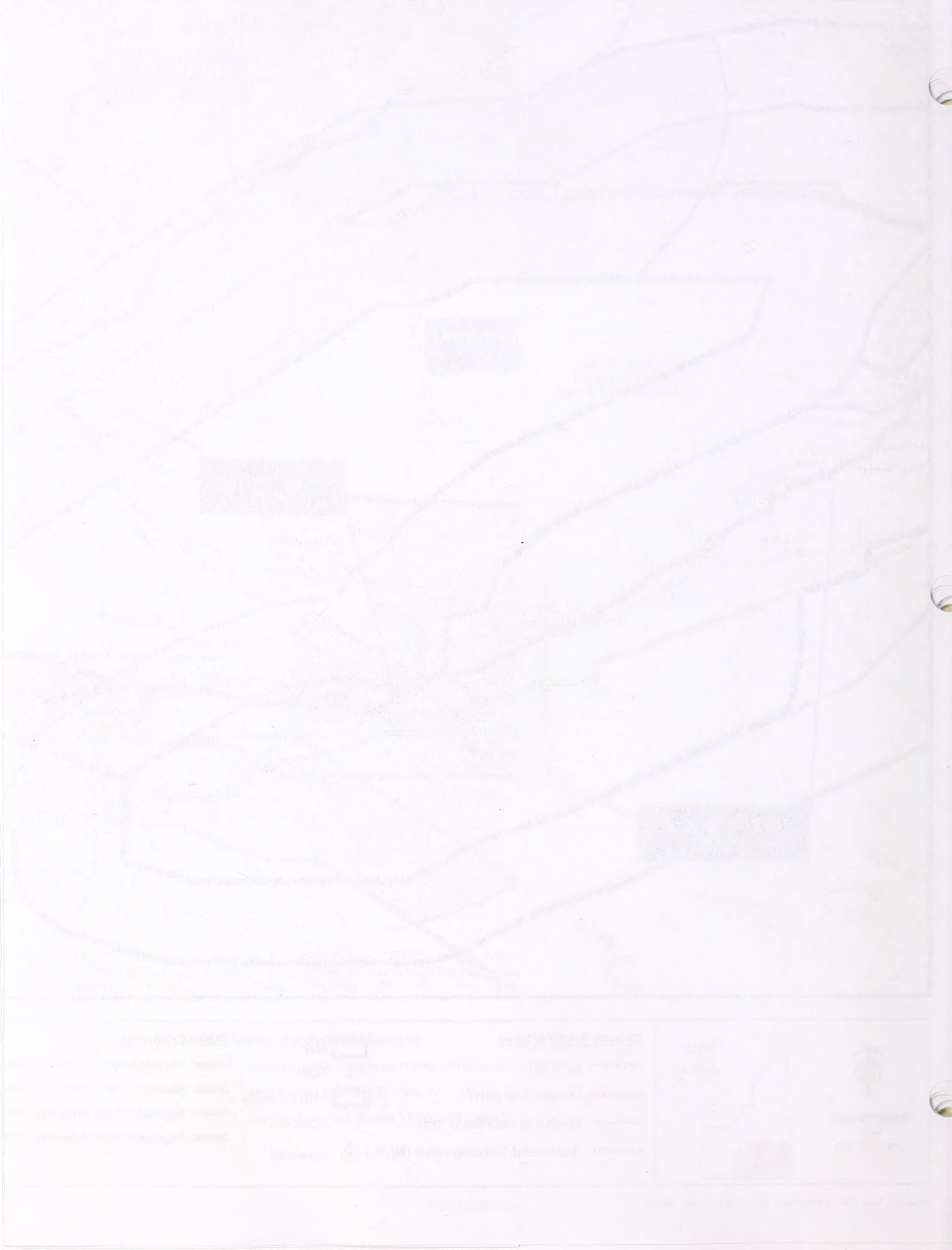

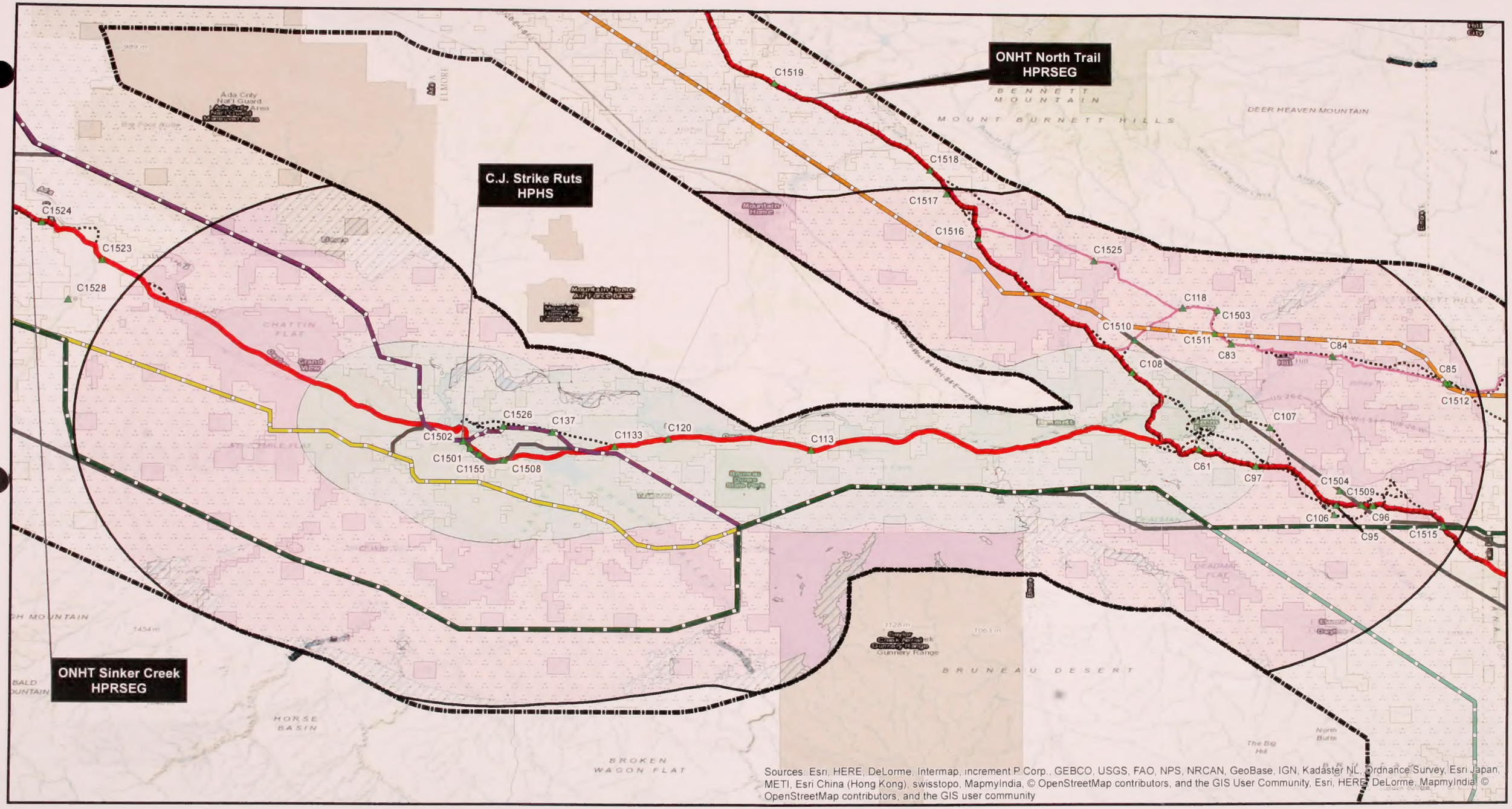

Map Area

0 5
Miles
GCS WGS 1984

Oregon Trail Features
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Gateway West
Transmission Line Project
Draft Supplemental EIS

Impacts Map AU3
OR TR. Feats., KOPs, Project Feats., and VRI

Figure C-5

Sources | BLM, Esri, Idaho Power, NPS, USFS, USGS, Ventyx

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Lowell

Indian Creek

869 m

UPPER
DEER FLAT

CANYON RIM

Kana

Ada

Melba

Canyon Overlook

HEMINGWAY
AWAY
NTAIN

1629 m
Wilson Peak

Coyote Butte

989 m

Ada Cr
Nat'l Gu
Ada Cnty
Nat'l Guar
Maneuver A

C1505
C1514
C1506
C1507
C90
C132
C91
C1527

ONHT Sinker Creek
HPRSEG

Sources: Esri, HERE, DeLorme, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, MapmyIndia, © OpenStreetMap contributors, and the GIS User Community, Esri, HERE, DeLorme, MapmyIndia, © OpenStreetMap contributors, and the GIS user community

Map Area

0 5
Miles
GCS WGS 1984

Oregon Trail Features

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- AU4
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Gateway West
Transmission Line Project
Draft Supplemental EIS

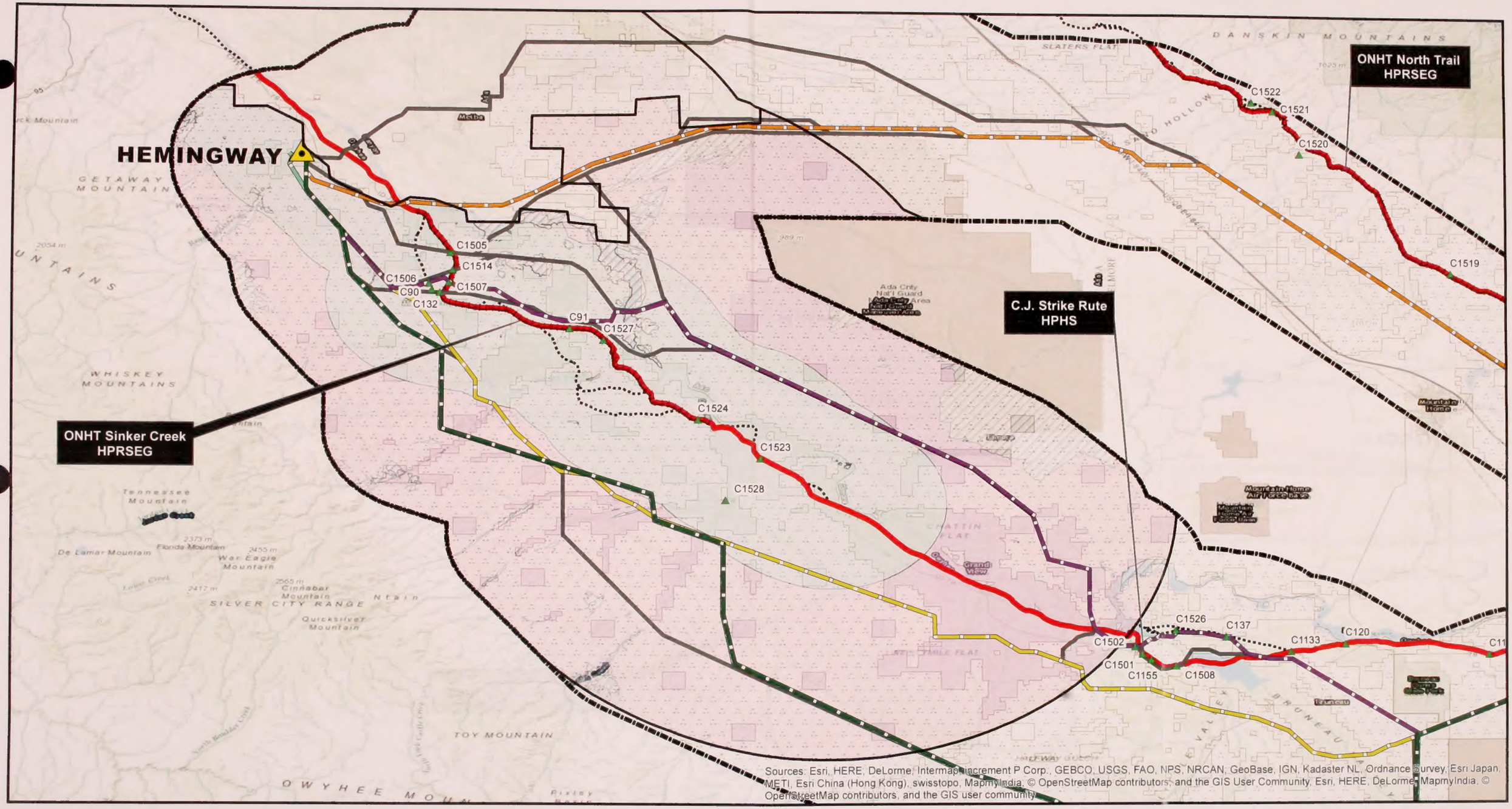
Impacts Map AU4a

OR TR. Feats., KOPs, Project Feats., and VRI

Figure C-6

Sources | BLM, Esri, Idaho Power, NPS, USFS, USGS, Ventyx

K:\22240030 Gateway West EIS_MXD\TrailsReport_ImpactsMaps_20150610.mxd leesa_gratreak 1/13/2016



Map Area

0 5
Miles
GCS WGS 1984

Oregon Trail Features
- HPRSEG
- Oregon Trail (NHT[1])
- North Alternate Study Trail
- Associated Trail Segments (NHT[2])
- AU4
- KOPs
- APAI Boundary
- BLM Land
- Substation

Project Features
- Alternative 8G
- Alternative 9K
- Segment 8 Rev. Prop. Rte.
- Segment 9 Rev. Prop. Rte.
- FEIS Proposed Route 9
- Route 8H
- Other 2013 FEIS Routes
- Toana Road Variations

VRI Distance Zones and Classes
- Foreground/Middleground 0-5Mi: VRI Class II
- Background 5-15Mi: VRI Class II
- Seldom Seen/Not in View +15Mi: VRI Class II

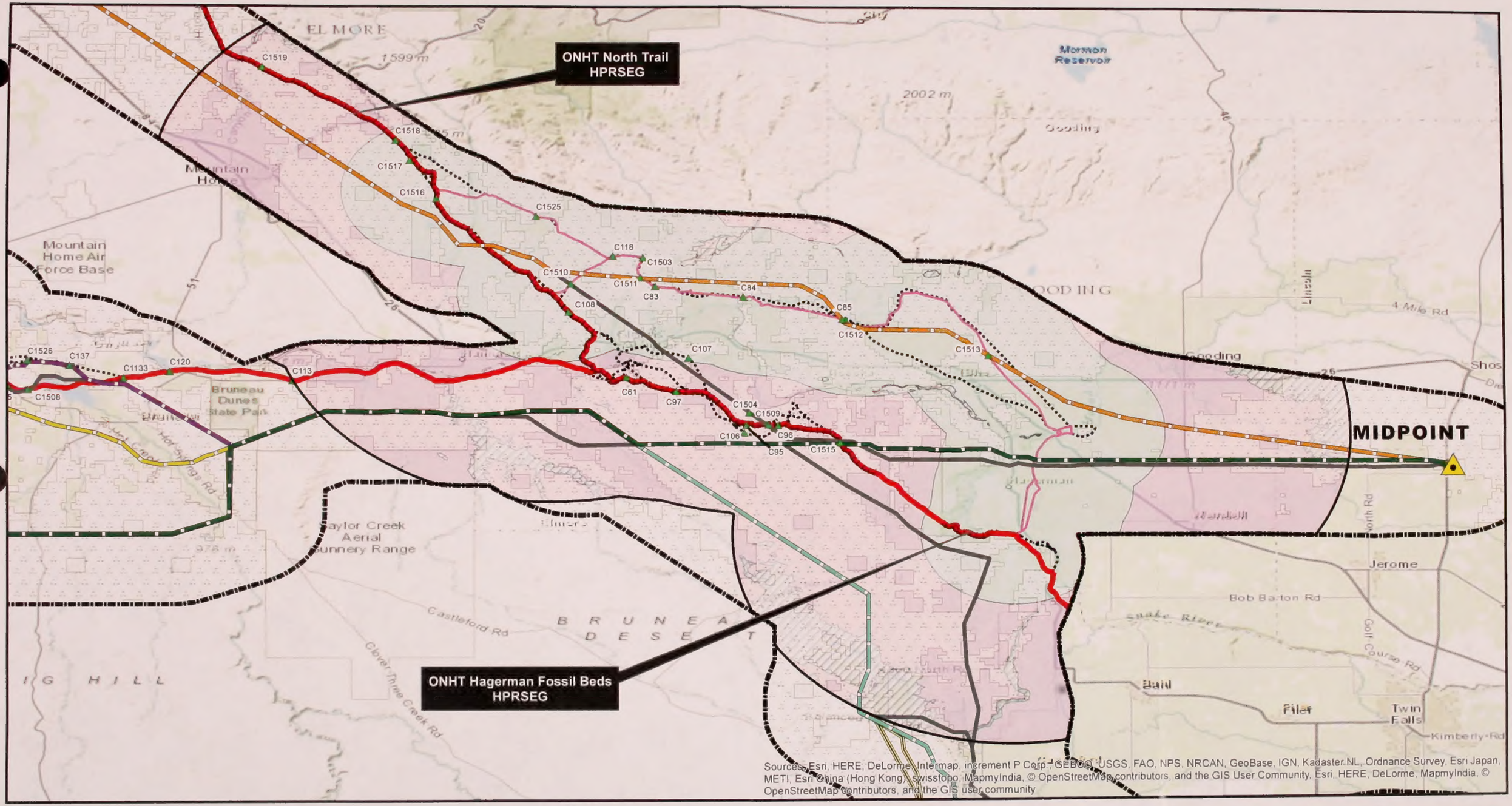
Gateway West
Transmission Line Project
Draft Supplemental EIS

Impacts Map AU4b
OR TR. Feats., KOPs, Project Feats., and VRI

Figure C-7

Sources | BLM, Esri, Idaho Power, NPS, USFS, USGS, Ventyx

K:\22240030 Gateway West EIS_MXD\TrailsReport_ImpactsMaps_20150610.mxd leesa_gratreak 1/13/2016



Map Area

0 5
Miles
GCS WGS 1984

Oregon Trail Features

- HPRSEG
- Oregon Trail (NHT[1])
- North Alternate Study Trail
- Associated Trail Segments (NHT[2])

- AU5
- KOPs
- APAI Boundary
- BLM Land
- Substation

Project Features

- Alternative 8G
- Alternative 9K
- Segment 8 Rev. Prop. Rte.
- Segment 9 Rev. Prop. Rte.
- FEIS Proposed Route 9
- Route 8H
- Other 2013 FEIS Routes
- Toana Road Variations

VRI Distance Zones and Classes

- Foreground/Middleground 0-5Mi: VRI Class III
- Background 5-15Mi: VRI Class IV
- Seldom Seen/Not in View +15Mi: VRI Class IV

Gateway West
Transmission Line Project
Draft Supplemental EIS

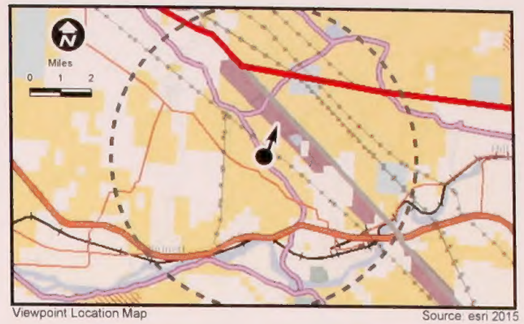
Impacts Map AU5
OR TR. Feats., KOPs, Project Feats., and VRI

Figure C-8

Sources | BLM, Esri, Idaho Power, NPS, USFS, USGS, Ventyx

K:\22240030 Gateway West EIS_MXD\TrailsReport_ImpactsMaps_20150610.mxd leesa_gratreak 1/13/2016

Attachment D
Project Simulations



Viewpoint Location Map

Source: esri 2015

Legend

- Key Observation Point
- Revised Proposed Route
- Revised Proposed Route (DC 500/138-kV)
- Feasible Route
- Routes Approved in 2013 ROD
- 2013 FEIS Routes
- Transmission Line (138-kV or greater)
- Nat'l Historic and Study Trails
- 5 Mile Distance Buffer

Land Status

- Bureau of Land Management
- Bureau of Reclamation
- Private
- State
- State Wildlife, Parks and Recreation, or Other

Photograph Information

Time of photograph:	3:26 PM
Date of photograph:	4-28-15
Weather condition:	Clear
Viewing direction:	Northeast
Latitude:	42° 59' 41.807" N
Longitude:	115° 21' 23.070" W
Nearest tower:	N/A
Farthest tower:	N/A

Photograph above is intended to be viewed 12" from viewer's eyes when printed on 11" x 17" paper. The photograph below was cropped, top and bottom, to show a wide-angle view of the area; the area in yellow depicts the location of the above imagery.

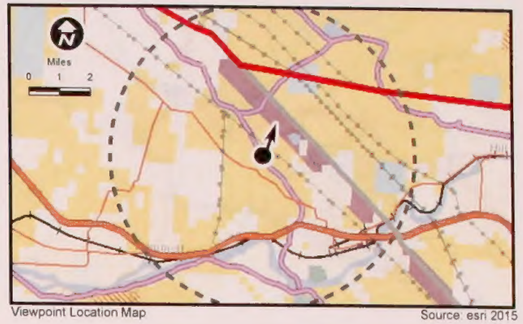
Existing Conditions from Key Observation Point C108 Route 8A

Gateway West
500kV Transmission Project
Idaho

March 2016

Figure D-1a

Z:\Projects\ENVPLANNING\IdahoPower\22240030_Gateway_West\Layouts\new layout gateway_sims revised.indd



Viewpoint Location Map

Source: esri 2015

Legend

- Key Observation Point
- Revised Proposed Route
- Revised Proposed Route (DC 500/138-kV)
- Feasible Route
- Routes Approved in 2013 ROD
- 2013 FEIS Routes
- Transmission Line (138-kV or greater)
- Nat'l Historic and Study Trails
- 5 Mile Distance Buffer

Land Status

- Bureau of Land Management
- Bureau of Reclamation
- Private
- State
- State Wildlife, Parks and Recreation, or Other

Photograph Information

Time of photograph:	3:26 PM
Date of photograph:	4-28-15
Weather condition:	Clear
Viewing direction:	Northeast
Latitude:	42° 59' 41.807" N
Longitude:	115° 21' 23.070" W
Nearest tower:	1.5 miles
Farthest tower:	3.0 miles

Photograph above is intended to be viewed 12" from viewer's eyes when printed on 11" x 17" paper. The photograph below was cropped, top and bottom, to show a wide-angle view of the area; the area in yellow depicts the location of the above imagery.

Photographic Simulation from Key Observation Point C108 Route 8A

Gateway West
500kV Transmission Project
Idaho

March 2016

Figure D-1b

Z:\Projects\ENVPLANNING\IdahoPower\22240030_Gateway_West\Layouts\new layout gateway_sims revised.indd

Viewpoint Location Map

Source: esri 2015

Legend

- Key Observation Point
- Revised Proposed Route
- Revised Proposed Route (DC 500/138-kV)
- Feasible Route
- Routes Approved in 2013 ROD
- 2013 FEIS Routes
- Transmission Line (138-kV or greater)
- Nat'l Historic and Study Trails
- 5 Mile Distance Buffer

Land Status

- Bureau of Land Management
- Bureau of Reclamation
- Private
- State
- State Wildlife, Parks and Recreation, or Other

Photograph Information

Time of photograph:	10:00 AM
Date of photograph:	5-1-15
Weather condition:	Clear
Viewing direction:	?
Latitude:	42° 55' 10.396" N
Longitude:	115° 56' 13.869" W
Nearest tower:	N/A
Farthest tower:	N/A

Photograph above is intended to be viewed 12" from viewer's eyes when printed on 11" x 17" paper. The photograph below was cropped, top and bottom, to show a wide-angle view of the area; the area in yellow depicts the location of the above imagery.

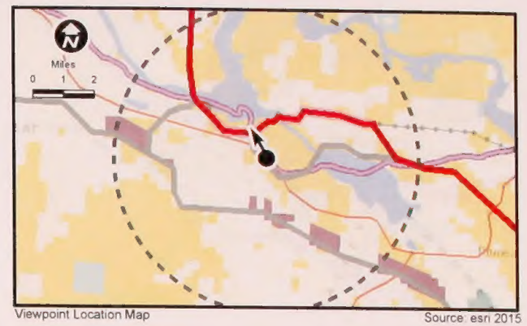
Existing Conditions from Key Observation Point C1501

Gateway West
500kV Transmission Project
Idaho

March 2016

Figure D-2a

Z:\Projects\ENVPLANNING\IdahoPower\22240030_Gateway_West\Layouts\new layout gateway_sims revised.indd



Viewpoint Location Map

Source: esri 2015

Legend

- Key Observation Point
- Revised Proposed Route
- Revised Proposed Route (DC 500/138-kV)
- Feasible Route
- Routes Approved in 2013 ROD
- 2013 FEIS Routes
- Transmission Line (138-kV or greater)
- Nat'l Historic and Study Trails
- 5 Mile Distance Buffer

Land Status

- Bureau of Land Management
- Bureau of Reclamation
- Private
- State
- State Wildlife, Parks and Recreation, or Other

Photograph Information

Time of photograph:	10:00 AM
Date of photograph:	5-1-15
Weather condition:	Clear
Viewing direction:	?
Latitude:	42° 55' 10.396" N
Longitude:	115° 56' 13.869" W
Nearest tower:	N/A
Farthest tower:	N/A

Photograph above is intended to be viewed 12" from viewer's eyes when printed on 11" x 17" paper. The photograph below was cropped, top and bottom, to show a wide-angle view of the area; the area in yellow depicts the location of the above imagery.

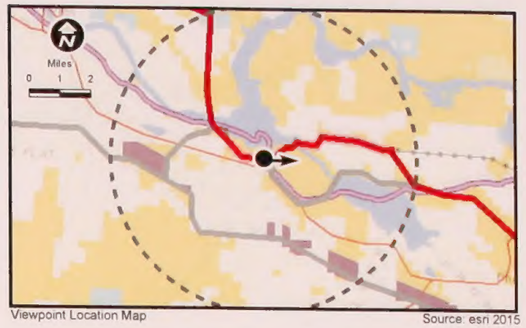
Photo Simulation from Key Observation Point C1501 Routes 9D, 9G

Gateway West
500kV Transmission Project
Idaho

March 2016

Figure D-2b

Z:\Projects\ENVPLANNING\IdahoPower\22240030_Gateway_West\Layouts\new layout gateway_sims revised.indd



Viewpoint Location Map

Source: esri 2015

Legend

- Key Observation Point
- Revised Proposed Route
- Revised Proposed Route (DC 500/138-kV)
- Feasible Route
- Routes Approved in 2013 ROD
- 2013 FEIS Routes
- Transmission Line (138-kV or greater)
- Nat'l Historic and Study Trails
- 5 Mile Distance Buffer

Land Status

- Bureau of Land Management
- Bureau of Reclamation
- Private
- State
- State Wildlife, Parks and Recreation, or Other

Photograph Information

Time of photograph:	10:57 AM
Date of photograph:	5-1-15
Weather condition:	Clear
Viewing direction:	East
Latitude:	42° 55' 51.568" N
Longitude:	115° 57' 4.292" W
Nearest tower:	N/A
Farthest tower:	N/A

Photograph above is intended to be viewed 12" from viewer's eyes when printed on 11" x 17" paper. The photograph below was cropped, top and bottom, to show a wide-angle view of the area; the area in yellow depicts the location of the above imagery.

Existing Conditions from Key Observation Point C1502

Gateway West
500kV Transmission Project
Idaho

March 2016

Figure D-3a

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Viewpoint Location Map

Source: esri 2015

Legend

- Key Observation Point
- Revised Proposed Route
- Revised Proposed Route (DC 500/138-kV)
- Feasible Route
- Routes Approved in 2013 ROD
- 2013 FEIS Routes
- Transmission Line (138-kV or greater)
- Nat'l Historic and Study Trails
- 5 Mile Distance Buffer

Land Status

- Bureau of Land Management
- Bureau of Reclamation
- Private
- State
- State Wildlife, Parks and Recreation, or Other

Photograph Information

Time of photograph:	10:57 AM
Date of photograph:	5-1-15
Weather condition:	Clear
Viewing direction:	East
Latitude:	42° 55' 51.568" N
Longitude:	115° 57' 4.292" W
Nearest tower:	1.8 miles
Farthest tower:	11.6 miles

Photograph above is intended to be viewed 12" from viewer's eyes when printed on 11" x 17" paper. The photograph below was cropped, top and bottom, to show a wide-angle view of the area; the area in yellow depicts the location of the above imagery.

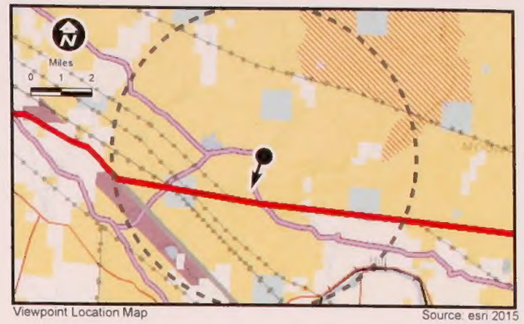
Photographic Simulation from Key Observation Point C1502 Segment 9 Revised Proposed Route

Gateway West
500kV Transmission Project
Idaho

March 2016

Figure D-3b

Z:\Projects\ENVPLANNING\IdahoPower\22240030_Gateway_West\Layouts\new layout gateway_sims revised.indd



Viewpoint Location Map

Source: esri 2015

Legend

- Key Observation Point
- Revised Proposed Route
- Revised Proposed Route (DC 500/138-kV)
- Feasible Route
- Routes Approved in 2013 ROD
- 2013 FEIS Routes
- Transmission Line (138-kV or greater)
- Nat'l Historic and Study Trails
- 5 Mile Distance Buffer

Land Status

- Bureau of Land Management
- Bureau of Reclamation
- Private
- State
- State Wildlife, Parks and Recreation, or Other

Photograph Information

Time of photograph:	4:26 PM
Date of photograph:	4-28-15
Weather condition:	Clear
Viewing direction:	South
Latitude:	43° 3' 4.688" N
Longitude:	115° 16' 45.732" W
Nearest tower:	N/A
Farthest tower:	N/A

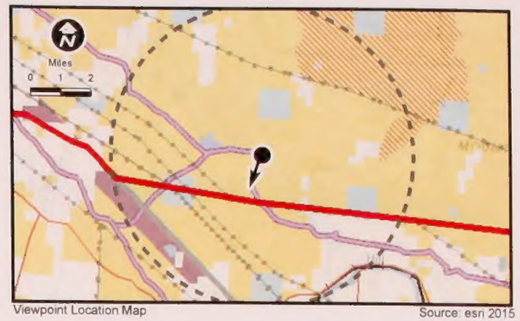
Photograph above is intended to be viewed 12" from viewer's eyes when printed on 11" x 17" paper. The photograph below was cropped, top and bottom, to show a wide-angle view of the area; the area in yellow depicts the location of the above imagery.

Existing Conditions from Key Observation Point C1503 Segment 8 Revised Proposed Route

Gateway West
500kV Transmission Project
Idaho

March 2016

Figure D-4a



Viewpoint Location Map

Source: esri 2015

Legend

- Key Observation Point
- Revised Proposed Route
- Revised Proposed Route (DC 500/138-kV)
- Feasible Route
- Routes Approved in 2013 ROD
- 2013 FEIS Routes
- Transmission Line (138-kV or greater)
- Nat'l Historic and Study Trails
- 5 Mile Distance Buffer

Land Status

- Bureau of Land Management
- Bureau of Reclamation
- Private
- State
- State Wildlife, Parks and Recreation, or Other

Photograph Information

Time of photograph:	4:26 PM
Date of photograph:	4-28-15
Weather condition:	Clear
Viewing direction:	South
Latitude:	43° 3' 4.688" N
Longitude:	115° 16' 45.732" W
Nearest tower:	1.5 miles
Farthest tower:	2.0 miles

Photograph above is intended to be viewed 12" from viewer's eyes when printed on 11" x 17" paper. The photograph below was cropped, top and bottom, to show a wide-angle view of the area; the area in yellow depicts the location of the above imagery.

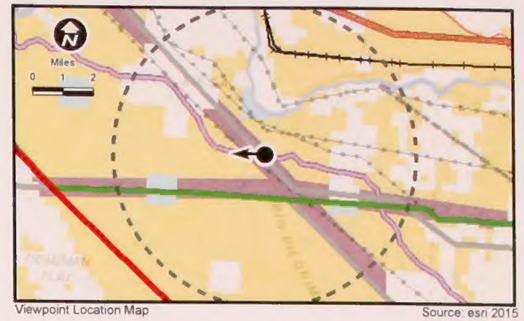
Photographic Simulation from Key Observation Point 1503 Segment 8 Revised Proposed Route

Gateway West
500kV Transmission Project
Idaho

March 2016

Figure D-4b

Z:\Projects\ENVPLANNING\IdahoPower\22240030_Gateway_West\Layouts\new layout gateway_sims revised.indd



Viewpoint Location Map

Source: esri 2015

Legend

- Key Observation Point
- Revised Proposed Route
- Revised Proposed Route (DC 500/138-kV)
- Feasible Route
- Routes Approved in 2013 ROD
- 2013 FEIS Routes
- Transmission Line (138-kV or greater)
- Nat'l Historic and Study Trails
- 5 Mile Distance Buffer

Land Status

- Bureau of Land Management
- Private
- State
- State Wildlife, Parks and Recreation, or Other

Photograph Information

Time of photograph:	10:31 AM
Date of photograph:	4-30-15
Weather condition:	Clear
Viewing direction:	West
Latitude:	42° 52' 38.287" N
Longitude:	115° 8' 55.123" W
Nearest tower:	N/A
Farthest tower:	N/A

Photograph above is intended to be viewed 12" from viewer's eyes when printed on 11" x 17" paper. The photograph below was cropped, top and bottom, to show a wide-angle view of the area; the area in yellow depicts the location of the above imagery.

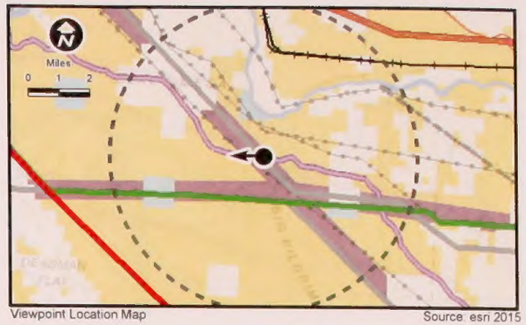
Existing Conditions from Key Observation Point C1509 Route 8A

Gateway West
500kV Transmission Project
Idaho

March 2016

Figure D-5a

Z:\Projects\ENVPLANNING\IdahoPower\22240030_Gateway_West\Layouts\new layout gateway_sims revised.indd



Viewpoint Location Map

Source: esri 2015

Legend

- Key Observation Point
- Revised Proposed Route
- Revised Proposed Route (DC 500/138-kV)
- Feasible Route
- Routes Approved in 2013 ROD
- 2013 FEIS Routes
- Transmission Line (138-kV or greater)
- Nat'l Historic and Study Trails
- 5 Mile Distance Buffer

Land Status

- Bureau of Land Management
- Private
- State
- State Wildlife, Parks and Recreation, or Other

Photograph Information

Time of photograph:	10:31 AM
Date of photograph:	4-30-15
Weather condition:	Clear
Viewing direction:	West
Latitude:	42° 52' 38.287" N
Longitude:	115° 8' 55.123" W
Nearest tower:	N/A
Farthest tower:	N/A

Photograph above is intended to be viewed 12" from viewer's eyes when printed on 11" x 17" paper. The photograph below was cropped, top and bottom, to show a wide-angle view of the area; the area in yellow depicts the location of the above imagery.

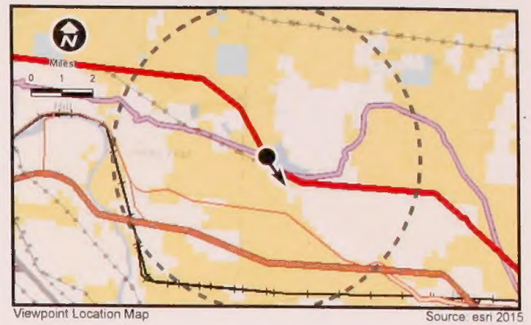
Photographic Simualtion from Key Observation Point C1509 Route 8A

Gateway West
500kV Transmission Project
Idaho

March 2016

Figure D-5b

Z:\Projects\ENVPLANNING\IdahoPower\22240030_Gateway_West\Layouts\new layout gateway_sims revised.indd



Viewpoint Location Map

Source: esri 2015

Legend

- Key Observation Point
- Revised Proposed Route
- Revised Proposed Route (DC 500/138-kV)
- Feasible Route
- Routes Approved in 2013 ROD
- 2013 FEIS Routes
- Transmission Line (138-kV or greater)
- Nat'l Historic and Study Trails
- 5 Mile Distance Buffer

Land Status

- Bureau of Land Management
- Private
- State
- State Wildlife, Parks and Recreation, or Other

Photograph Information

Time of photograph:	10:15 AM
Date of photograph:	4-29-15
Weather condition:	Clear
Viewing direction:	Southeast
Latitude:	42° 52' 38.287" N
Longitude:	115° 8' 55.123" W
Nearest tower:	N/A
Farthest tower:	N/A

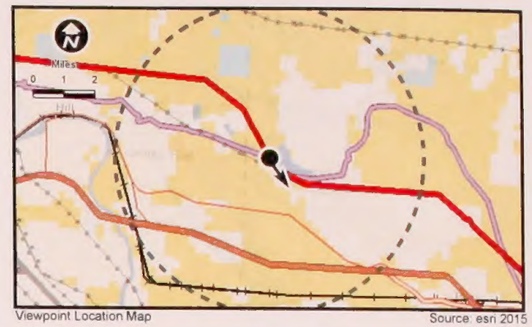
Photograph above is intended to be viewed 12" from viewer's eyes when printed on 11" x 17" paper. The photograph below was cropped, top and bottom, to show a wide-angle view of the area; the area in yellow depicts the location of the above imagery.

Existing Conditions from Key Observation Point C1512

Gateway West
500kV Transmission Project
Idaho

March 2016

Figure D-6a



Viewpoint Location Map

Source: esri 2015

Legend

- Key Observation Point
- Revised Proposed Route
- Revised Proposed Route (DC 500/138-kV)
- Feasible Route
- Routes Approved in 2013 ROD
- 2013 FEIS Routes
- Transmission Line (138-kV or greater)
- Nat'l Historic and Study Trails
- 5 Mile Distance Buffer

Land Status

- Bureau of Land Management
- Private
- State
- State Wildlife, Parks and Recreation, or Other

Photograph Information

Time of photograph:	10:15 AM
Date of photograph:	4-29-15
Weather condition:	Clear
Viewing direction:	Southeast
Latitude:	42° 52' 38.287" N
Longitude:	115° 8' 55.123" W
Nearest tower:	100 feet
Farthest tower:	1.5 miles

Photograph above is intended to be viewed 12" from viewer's eyes when printed on 11" x 17" paper. The photograph below was cropped, top and bottom, to show a wide-angle view of the area; the area in yellow depicts the location of the above imagery.

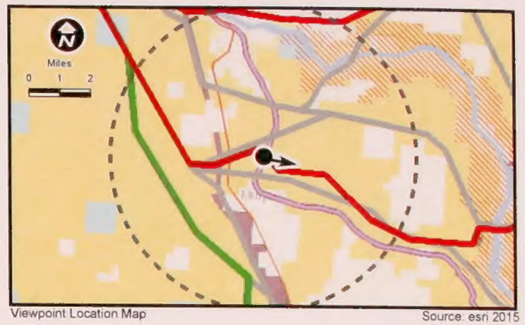
Photographic Simulation from Key Observation Point C1512 Segment 8 Revised Proposed Route

Gateway West
500kV Transmission Project
Idaho

March 2016

Figure D-6b

Z:\Projects\ENVPLANNING\IdahoPower\22240030_Gateway_West\Layouts\new layout gateway_sims revised.indd



Viewpoint Location Map

Source: esri 2015

Legend

- Key Observation Point
- Revised Proposed Route
- Revised Proposed Route (DC 500/138-kV)
- Feasible Route
- Routes Approved in 2013 ROD
- 2013 FEIS Routes
- Transmission Line (138-kV or greater)
- Nat'l Historic and Study Trails
- 5 Mile Distance Buffer

Land Status

- Bureau of Land Management
- Bureau of Reclamation
- Fish and Wildlife Service
- Private
- State
- State Wildlife, Parks and Recreation, or Other

Photograph Information

Time of photograph:	9:51 AM
Date of photograph:	4-27-15
Weather condition:	Clear
Viewing direction:	Southwest
Latitude:	43° 14' 20.295" N
Longitude:	116° 32' 13.905" W
Nearest tower:	N/A
Farthest tower:	N/A

Photograph above is intended to be viewed 12" from viewer's eyes when printed on 11" x 17" paper. The photograph below was cropped, top and bottom, to show a wide-angle view of the area; the area in yellow depicts the location of the above imagery.

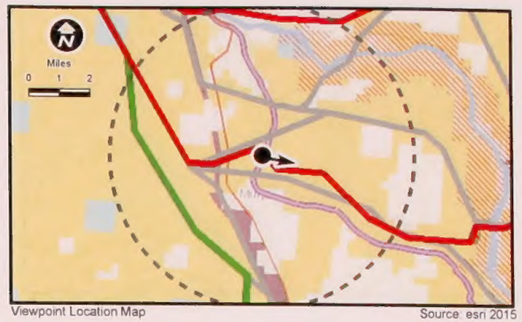
Existing Conditions from Key Observation Point C1514 Segment 9 Revised Proposed Route

Gateway West
500kV Transmission Project
Idaho

March 2016

Figure D-7a

Z:\Projects\ENVPLANNING\IdahoPower\122240030_Gateway_West\Layouts\new layout gateway_sims revised.indd



Viewpoint Location Map

Source: esri 2015

Legend

- Key Observation Point
- Revised Proposed Route
- Revised Proposed Route (DC 500/138-kV)
- Feasible Route
- Routes Approved in 2013 ROD
- 2013 FEIS Routes
- Transmission Line (138-kV or greater)
- Nat'l Historic and Study Trails
- 5 Mile Distance Buffer

Land Status

- Bureau of Land Management
- Bureau of Reclamation
- Fish and Wildlife Service
- Private
- State
- State Wildlife, Parks and Recreation, or Other

Photograph Information

Time of photograph:	9:51 AM
Date of photograph:	4-27-15
Weather condition:	Clear
Viewing direction:	Southwest
Latitude:	43° 14' 20.295" N
Longitude:	116° 32' 13.905" W
Nearest tower:	400 feet
Farthest tower:	2,040 feet

Photograph above is intended to be viewed 12" from viewer's eyes when printed on 11" x 17" paper. The photograph below was cropped, top and bottom, to show a wide-angle view of the area; the area in yellow depicts the location of the above imagery.

Photographic Simulation from Key Observation Point C1514 Segment 9 Revised Proposed Route

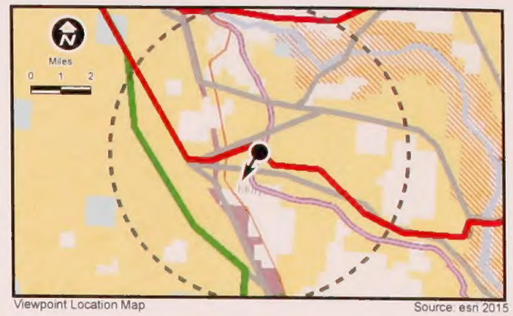
Gateway West
500kV Transmission Project
Idaho

March 2016

Figure D-7b

Z:\Projects\ENVPLANNING\IdahoPower\22240030_Gateway_West\Layouts\new layout gateway_sims revised.indd

Photograph above is intended to be viewed 12" from viewer's eyes when printed on 11" x 17" paper. The photograph below was cropped, top and bottom, to show a wide-angle view of the area; the area in yellow depicts the location of the above imagery.



Viewpoint Location Map

Source: esri 2015

Legend

- Key Observation Point
- Revised Proposed Route
- Revised Proposed Route (DC 500/138-kV)
- Feasible Route
- Routes Approved in 2013 ROD
- 2013 FEIS Routes
- Transmission Line (138-kV or greater)
- Nat'l Historic and Study Trails
- 5 Mile Distance Buffer

Land Status

- Bureau of Land Management
- Bureau of Reclamation
- Fish and Wildlife Service
- Private
- State
- State Wildlife, Parks and Recreation, or Other

Photograph Information

Time of photograph:	9:51 AM
Date of photograph:	4-27-15
Weather condition:	Clear
Viewing direction:	Southwest
Latitude:	43° 14' 20.295" N
Longitude:	116° 32' 13.905" W
Nearest tower:	400 feet
Farthest tower:	2,040 feet

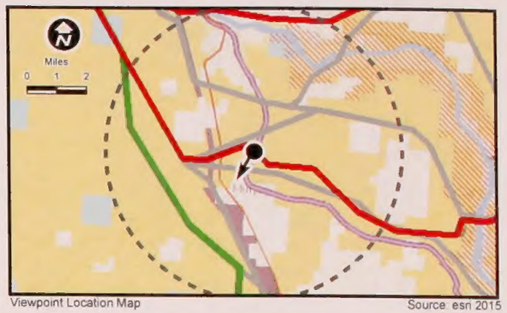
Existing Conditions from Key Observation Point C1514 Route 9G/9H

Gateway West
500kV Transmission Project
Idaho

March 2016

Figure D-8a

Z:\Projects\ENVPLANNING\IdahoPower\22240030_Gateway_West\Layouts\new layout gateway_sims revised.indd



Viewpoint Location Map

Source: esri 2015

Legend

- Key Observation Point
- Revised Proposed Route
- Revised Proposed Route (DC 500/138-kV)
- Feasible Route
- Routes Approved in 2013 ROD
- 2013 FEIS Routes
- Transmission Line (138-kV or greater)
- Nat'l Historic and Study Trails
- 5 Mile Distance Buffer

Land Status

- Bureau of Land Management
- Bureau of Reclamation
- Fish and Wildlife Service
- Private
- State
- State Wildlife, Parks and Recreation, or Other

Photograph Information

Time of photograph:	9:51 AM
Date of photograph:	4-27-15
Weather condition:	Clear
Viewing direction:	Southwest
Latitude:	43° 14' 20.295" N
Longitude:	116° 32' 13.905" W
Nearest tower:	400 feet
Farthest tower:	2,040 feet

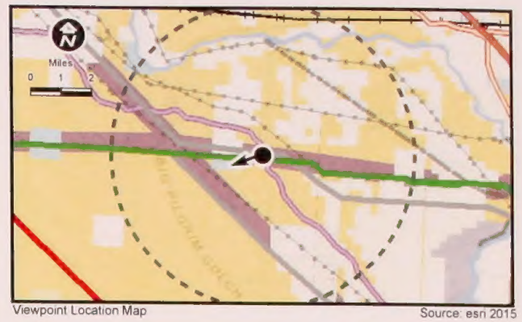
Photograph above is intended to be viewed 12" from viewer's eyes when printed on 11" x 17" paper. The photograph below was cropped, top and bottom, to show a wide-angle view of the area; the area in yellow depicts the location of the above imagery.

Photographic Simulation from Key Observation Point C1514 Route 9G/9H

Gateway West
500kV Transmission Project
Idaho

March 2016

Figure D-8b



Viewpoint Location Map

Source: esri 2015

Legend

- Key Observation Point
- Revised Proposed Route
- Revised Proposed Route (DC 500/138-kV)
- Feasible Route
- Routes Approved in 2013 ROD
- 2013 FEIS Routes
- Transmission Line (138-kV or greater)
- Nat'l Historic and Study Trails
- 5 Mile Distance Buffer

Land Status

- Bureau of Land Management
- Bureau of Reclamation
- National Park Service
- Private
- State
- State Wildlife, Parks and Recreation, or Other

Photograph Information

Time of photograph:	12:39 PM
Date of photograph:	4-30-15
Weather condition:	Partly Cloudy
Viewing direction:	Southwest
Latitude:	42° 51' 30.322" N
Longitude:	115° 4' 25.446" W
Nearest tower:	N/A
Farthest tower:	N/A

Photograph above is intended to be viewed 12" from viewer's eyes when printed on 11" x 17" paper. The photograph below was cropped, top and bottom, to show a wide-angle view of the area; the area in yellow depicts the location of the above imagery.

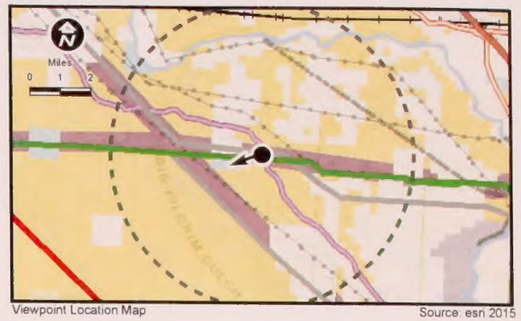
Existing Conditions from Key Observation Point C1515

Gateway West
500kV Transmission Project
Idaho

March 2016

Figure D-9a

Z:\Projects\ENVPLANNING\IdahoPower\22240030_Gateway_West\Layouts\new layout gateway_sims revised.indd



Viewpoint Location Map

Source: esri 2015

Legend

- Key Observation Point
- Revised Proposed Route
- Revised Proposed Route (DC 500/138-kV)
- Feasible Route
- Routes Approved in 2013 ROD
- 2013 FEIS Routes
- Transmission Line (138-kV or greater)
- Nat'l Historic and Study Trails
- 5 Mile Distance Buffer

Land Status

- Bureau of Land Management
- Bureau of Reclamation
- National Park Service
- Private
- State
- State Wildlife, Parks and Recreation, or Other

Photograph Information

Time of photograph:	12:39 PM
Date of photograph:	4-30-15
Weather condition:	Partly Cloudy
Viewing direction:	Southwest
Latitude:	42° 51' 30.322" N
Longitude:	115° 4' 25.446" W
Nearest tower:	N/A
Farthest tower:	N/A

Photograph above is intended to be viewed 12" from viewer's eyes when printed on 11" x 17" paper. The photograph below was cropped, top and bottom, to show a wide-angle view of the area; the area in yellow depicts the location of the above imagery.

Photographic Simulation from Key Observation Point C1515 Route 8G

Gateway West
500kV Transmission Project
Idaho

March 2016

Figure D-9b

Viewpoint Location Map

Source: esri 2015

Legend

- Key Observation Point
- Revised Proposed Route
- Revised Proposed Route (DC 500/138-kV)
- Feasible Route
- Routes Approved in 2013 ROD
- 2013 FEIS Routes
- Transmission Line (138-kV or greater)
- Nat'l Historic and Study Trails
- 5 Mile Distance Buffer

Land Status

- Bureau of Land Management
- Bureau of Reclamation
- Forest Service
- Private
- State

Photograph Information

Time of photograph:	11:07 AM
Date of photograph:	4-28-15
Weather condition:	Clear
Viewing direction:	Southwest
Latitude:	43° 15' 4.333" N
Longitude:	115° 40' 35.776" W
Nearest tower:	N/A
Farthest tower:	N/A

Photograph above is intended to be viewed 12" from viewer's eyes when printed on 11" x 17" paper. The photograph below was cropped, top and bottom, to show a wide-angle view of the area; the area in yellow depicts the location of the above imagery.

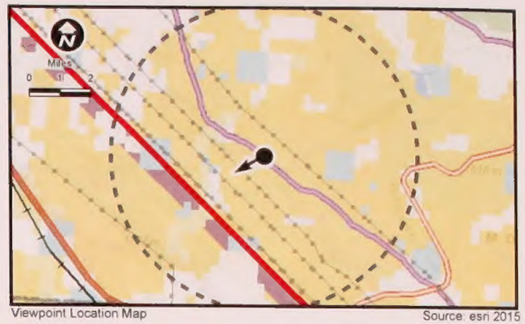
Existing Conditions from Key Observation Point C1519 Segment 8 Revised Proposed Route

Gateway West
500kV Transmission Project
Idaho

March 2016

Figure D-10a

Z:\Projects\ENVPLANNING\IdahoPower\22240030_Gateway_West\Layouts\new layout gateway_sims revised.indd



Viewpoint Location Map

Source: esri 2015

Legend

- Key Observation Point
- Revised Proposed Route
- Revised Proposed Route (DC 500/138-kV)
- Feasible Route
- Routes Approved in 2013 ROD
- 2013 FEIS Routes
- Transmission Line (138-kV or greater)
- Nat'l Historic and Study Trails
- 5 Mile Distance Buffer

Land Status

- Bureau of Land Management
- Bureau of Reclamation
- Forest Service
- Private
- State

Photograph Information

Time of photograph:	11:07 AM
Date of photograph:	4-28-15
Weather condition:	Clear
Viewing direction:	Southwest
Latitude:	43° 15' 4.333" N
Longitude:	115° 40' 35.776" W
Nearest tower:	2.48 miles
Farthest tower:	7.5 miles

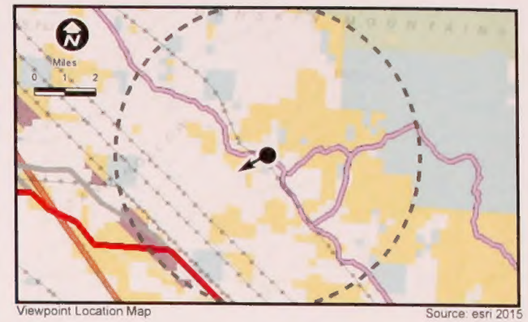
Photograph above is intended to be viewed 12" from viewer's eyes when printed on 11" x 17" paper. The photograph below was cropped, top and bottom, to show a wide-angle view of the area; the area in yellow depicts the location of the above imagery.

Photographic Simulation from Key Observation Point C1519 Segment 8 Revised Proposed Route

Gateway West
500kV Transmission Project
Idaho

March 2016

Figure D-10b



Viewpoint Location Map

Source: esri 2015

Legend

- Key Observation Point
- Revised Proposed Route
- Revised Proposed Route (DC 500/138-kV)
- Feasible Route
- Routes Approved in 2013 ROD
- 2013 FEIS Routes
- Transmission Line (138-kV or greater)
- Nat'l Historic and Study Trails
- 5 Mile Distance Buffer

Land Status

- Bureau of Land Management
- Bureau of Reclamation
- Forest Service
- Private
- State
- State Wildlife, Parks and Recreation, or Other

Photograph Information

Time of photograph:	9:32 AM
Date of photograph:	4-28-15
Weather condition:	Clear
Viewing direction:	Southwest
Latitude:	43° 23' 24.224" N
Longitude:	115° 49' 53.085" W
Nearest tower:	N/A
Farthest tower:	N/A

Photograph above is intended to be viewed 12" from viewer's eyes when printed on 11" x 17" paper. The photograph below was cropped, top and bottom, to show a wide-angle view of the area; the area in yellow depicts the location of the above imagery.

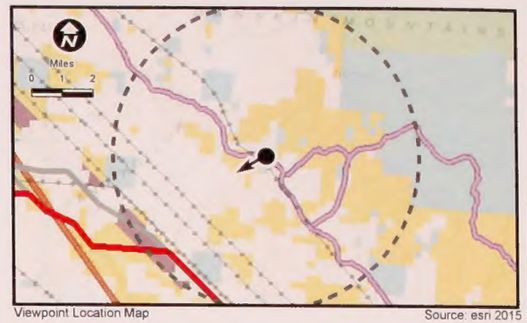
Existing Conditions from Key Observation Point C1521 Route 8C

Gateway West
500kV Transmission Project
Idaho

March 2016

Figure D-11a

Z:\Projects\ENV_CLP-WNING\IdahoPower\22240030_Gateway_West\Layouts\new layout gateway_sims revised.indd



Viewpoint Location Map

Source: esri 2015

Legend

- Key Observation Point
- Revised Proposed Route
- Revised Proposed Route (DC 500/138-kV)
- Feasible Route
- Routes Approved in 2013 ROD
- 2013 FEIS Routes
- Transmission Line (138-kV or greater)
- Nat'l Historic and Study Trails
- 5 Mile Distance Buffer

Land Status

- Bureau of Land Management
- Bureau of Reclamation
- Forest Service
- Private
- State
- State Wildlife, Parks and Recreation, or Other

Photograph Information

Time of photograph:	9:32 AM
Date of photograph:	4-28-15
Weather condition:	Clear
Viewing direction:	Southwest
Latitude:	43° 23' 24.224" N
Longitude:	115° 49' 53.085" W
Nearest tower:	4.6 miles
Farthest tower:	8.9 miles

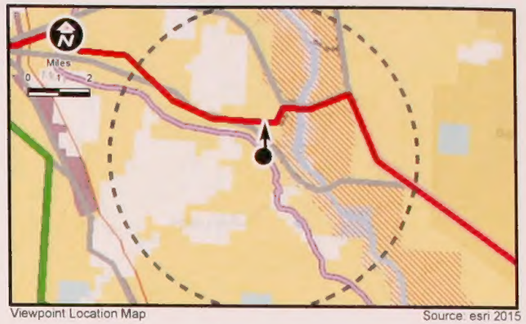
Photograph above is intended to be viewed 12" from viewer's eyes when printed on 11" x 17" paper. The photograph below was cropped, top and bottom, to show a wide-angle view of the area; the area in yellow depicts the location of the above imagery.

Photographic Simulation from Key Observation Point C1521 Route 8C

Gateway West
500kV Transmission Project
Idaho

March 2016

Figure D-11b



Viewpoint Location Map

Source: esri 2015

Legend

- Key Observation Point
- Revised Proposed Route
- Revised Proposed Route (DC 500/138-kV)
- Feasible Route
- Routes Approved in 2013 ROD
- 2013 FEIS Routes
- Transmission Line (138-kV or greater)
- Nat'l Historic and Study Trails
- 5 Mile Distance Buffer

Land Status

- Bureau of Land Management
- Bureau of Reclamation
- Private
- State

Photograph Information

Time of photograph:	9:56 AM
Date of photograph:	5-2-15
Weather condition:	Clear
Viewing direction:	Northeast
Latitude:	43° 11' 24.322" N
Longitude:	116° 24' 19.570" W
Nearest tower:	N/A
Farthest tower:	N/A

Photograph above is intended to be viewed 12" from viewer's eyes when printed on 11" x 17" paper. The photograph below was cropped, top and bottom, to show a wide-angle view of the area; the area in yellow depicts the location of the above imagery.

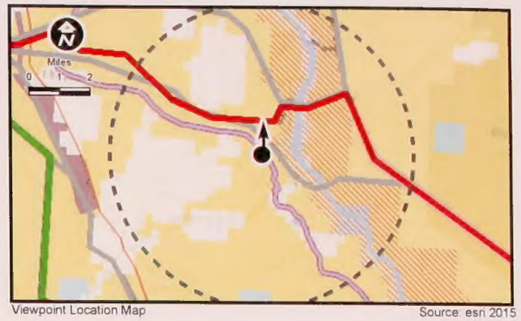
Existing Conditions from Key Observation Point C1527

Gateway West
500kV Transmission Project
Idaho

March 2016

Figure D-12a

Z:\Projects\ENV-LANNING\IdahoPower\22240030_Gateway_West\Layouts\new layout gateway_sims revised.indd



Viewpoint Location Map

Source: esri 2015

Legend

- Key Observation Point
- Revised Proposed Route
- Revised Proposed Route (DC 500/138-kV)
- Feasible Route
- Routes Approved in 2013 ROD
- 2013 FEIS Routes
- Transmission Line (138-kV or greater)
- Nat'l Historic and Study Trails
- 5 Mile Distance Buffer

Land Status

- Bureau of Land Management
- Bureau of Reclamation
- Private
- State

Photograph Information

Time of photograph:	9:56 AM
Date of photograph:	5-2-15
Weather condition:	Clear
Viewing direction:	Northeast
Latitude:	43° 11' 24.322" N
Longitude:	116° 24' 19.570" W
Nearest tower:	1.12 miles
Farthest tower:	1.8 miles

Photograph above is intended to be viewed 12" from viewer's eyes when printed on 11" x 17" paper. The photograph below was cropped, top and bottom, to show a wide-angle view of the area; the area in yellow depicts the location of the above imagery.

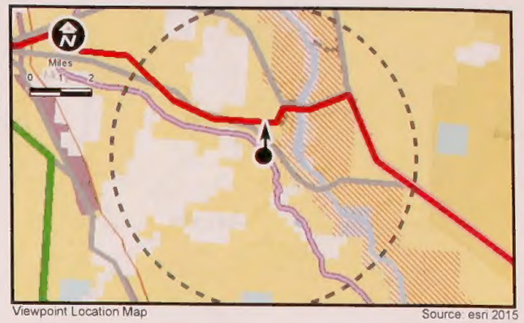
Photographic Simulation from Key Observation Point C1527 Segment 9 Revised Proposed Route

Gateway West
500kV Transmission Project
Idaho

March 2016

Figure D-12b

Z:\Projects\ENVPLANNING\IdahoPower\22240030_Gateway_West\Layouts\new layout gateway_sims revised.indd



Viewpoint Location Map

Source: esri 2015

Legend

- Key Observation Point
- Revise Proposed Route
- Revised Proposed Route (DC 500/138-kV)
- Feasible Route
- Routes Approved in 2013 ROD
- 2013 FEIS Routes
- Transmission Line (138-kV or greater)
- Nat'l Historic and Study Trails
- 5 Mile Distance Buffer

Land Status

- Bureau of Land Management
- Bureau of Reclamation
- Private
- State

Photograph Information

Time of photograph:	9:56 AM
Date of photograph:	5-2-15
Weather condition:	Clear
Viewing direction:	Northeast
Latitude:	43° 11' 24.322" N
Longitude:	116° 24' 19.570" W
Nearest tower:	0.4 mile
Farthest tower:	0.8 mile

Photograph above is intended to be viewed 12" from viewer's eyes when printed on 11" x 17" paper. The photograph below was cropped, top and bottom, to show a wide-angle view of the area; the area in yellow depicts the location of the above imagery.

Photographic Simulation from Key Oberservaion Point C1527 Route 9G/9H

Gateway West
500kV Transmission Project
Idaho

March 2016

Figuree D-12c

Attachment E
Cumulative Impacts Maps

HEMINGWAY

MIDPOINT

CEDAR HILL

Ada Cnty Nat'l Guard Maneuver Area

Saylor Creek Aerial Gunnery Range

Mountain Home

SMOKY MOUNTAINS

BRUNEAU DESERT

INSIDE DESERT

OWYHEE

Sources: Esri, HERE, DeLorme, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, MapmyIndia, © OpenStreetMap contributors, and the GIS User Community, Esri, HERE, DeLorme, MapmyIndia, © OpenStreetMap contributors, and the GIS user community

Map Area

0 5
Miles
GCS WGS 1984

Oregon Trail Features

- HPRSEG
- Oregon Trail (NHT[1])
- North Alternate Study Trail
- Associated Trail Segments (NHT[2])

- Cummulative Impact Area
- KOPs
- Substation

Project Features

- Alternative 8G
- Alternative 9K
- Segment 8 Rev. Prop. Rte.
- Segment 9 Rev. Prop. Rte.
- FEIS Proposed Route 9
- Route 8H
- Other 2013 FEIS Routes

Existing Modifications

Windfarms

- Proposed
- In Permitting Process
- Operating
- Existing Transmission Lines (+100kV)

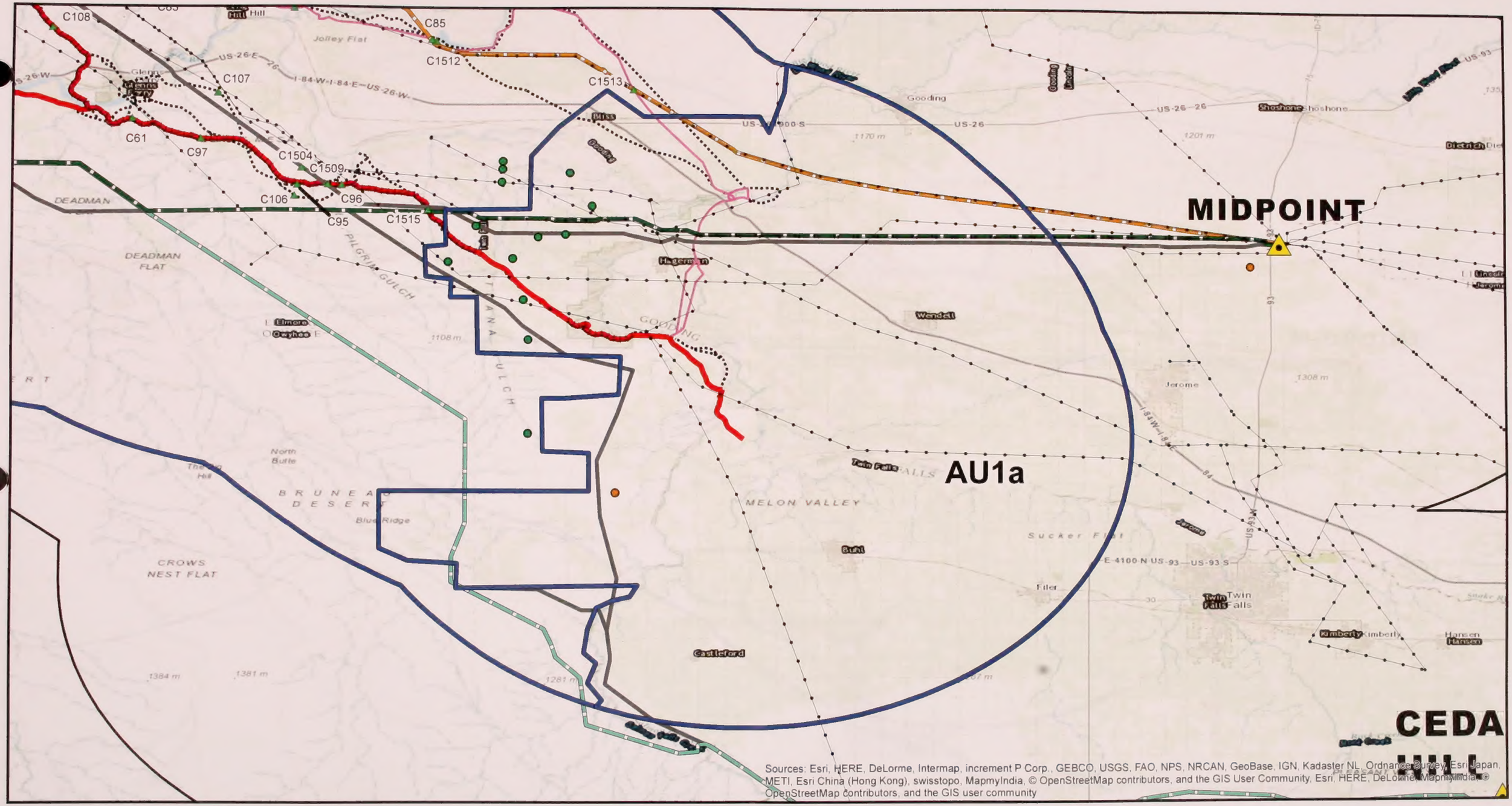
Gateway West
Transmission Line Project
Draft Supplemental EIS

Cumulative Impacts Map Overview
OR TR. Feats., Proj. Feats., and Existing Mods.

Figure E-1

Sources | BLM, Esri, Idaho Power, NPS, USFS, USGS, Ventyx

K:\22240030 Gateway West EIS_MXD\TrailsReport_CumulativeImpactsMaps_20150610.mxd leesa_gratreak 1/13/2016



Map Area

Miles

GCS WGS 1984

Oregon Trail Features

- HPRSEG
- Oregon Trail (NHT[1])
- North Alternate Study Trail
- Associated Trail Segments (NHT[2])

- Cummulative Impact Area
- KOPs
- AU1
- Substation

Project Features

- Alternative 8G
- Alternative 9K
- Segment 8 Rev. Prop. Rte.
- Segment 9 Rev. Prop. Rte.
- FEIS Proposed Route 9
- Route 8H
- Other 2013 FEIS Routes

Existing Modifications

Windfarms

- Proposed
- In Permitting Process
- Operating
- Existing Transmission Lines (+100kV)

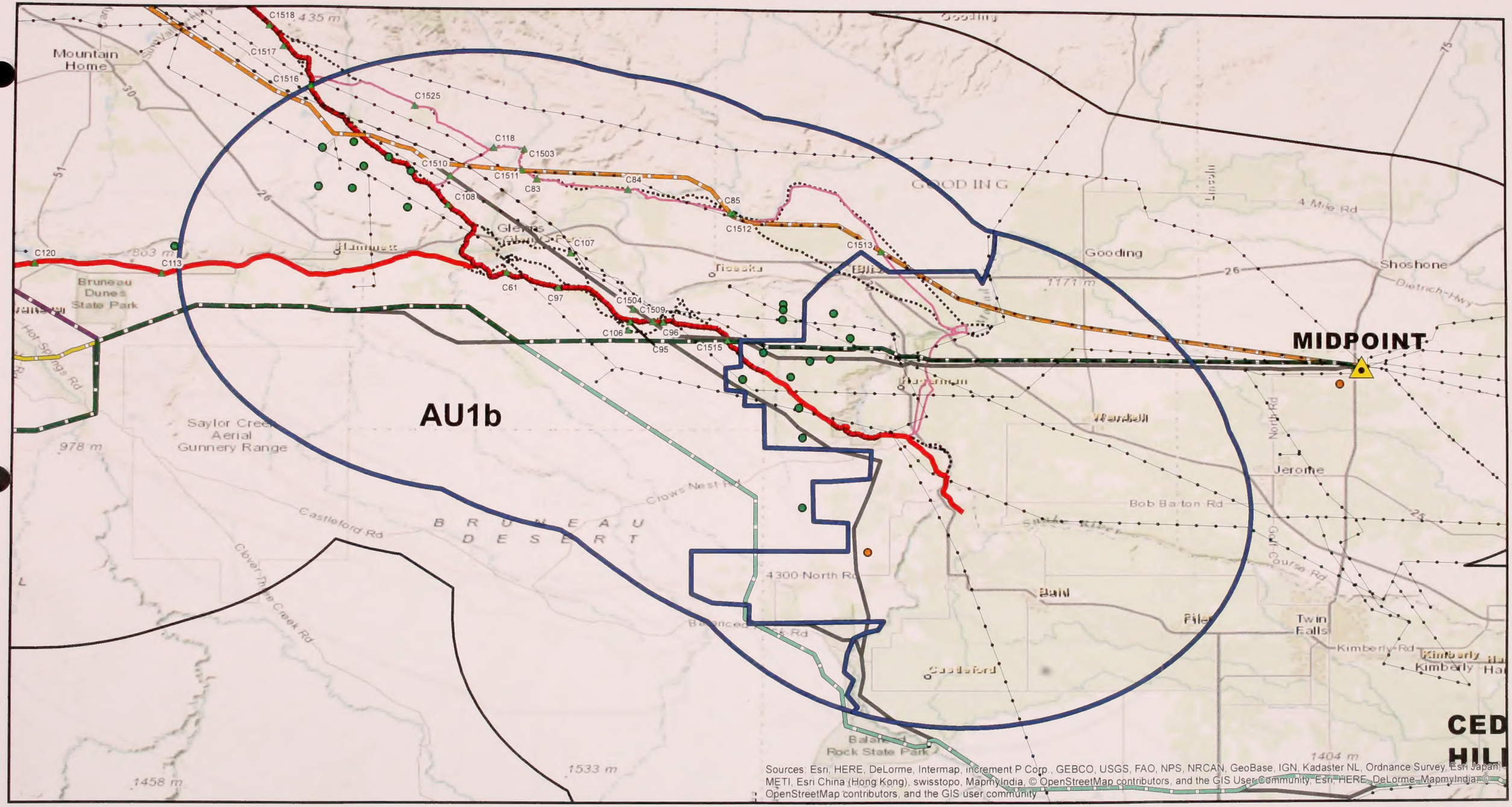
Gateway West
Transmission Line Project
Draft Supplemental EIS

Cumulative Impacts Map AU1a
OR TR. Feats., Proj. Feats., and Existing Mods.

Figure E-2

Sources | BLM, Esri, Idaho Power, NPS, USFS, USGS, Ventyx

K:\22240030 Gateway West EIS_MXD\TrailsReport_CumulativeImpactsMaps_20150610.mxd leesa_gratreak 1/13/2016



Map Area

0 5
Miles
GCS WGS 1984

Oregon Trail Features
- HPRSEG
- Oregon Trail (NHT[1])
- North Alternate Study Trail
- Associated Trail Segments (NHT[2])

- Cummulative Impact Area
- KOPs
- AU1
- Substation

Project Features
- Alternative 8G
- Alternative 9K
- Segment 8 Rev. Prop. Rte.
- Segment 9 Rev. Prop. Rte.
- FEIS Proposed Route 9
- Route 8H
- Other 2013 FEIS Routes

Existing Modifications

Windfarms
- Proposed
- In Permitting Process
- Operating

- Existing Transmission Lines (+100kV)

Gateway West
Transmission Line Project
Draft Supplemental EIS

Cumulative Impacts Map AU1b
OR TR. Feats., Proj. Feats., and Existing Mods.

Figure E-3

Sources | BLM, Esri, Idaho Power, NPS, USFS, USGS, Ventyx

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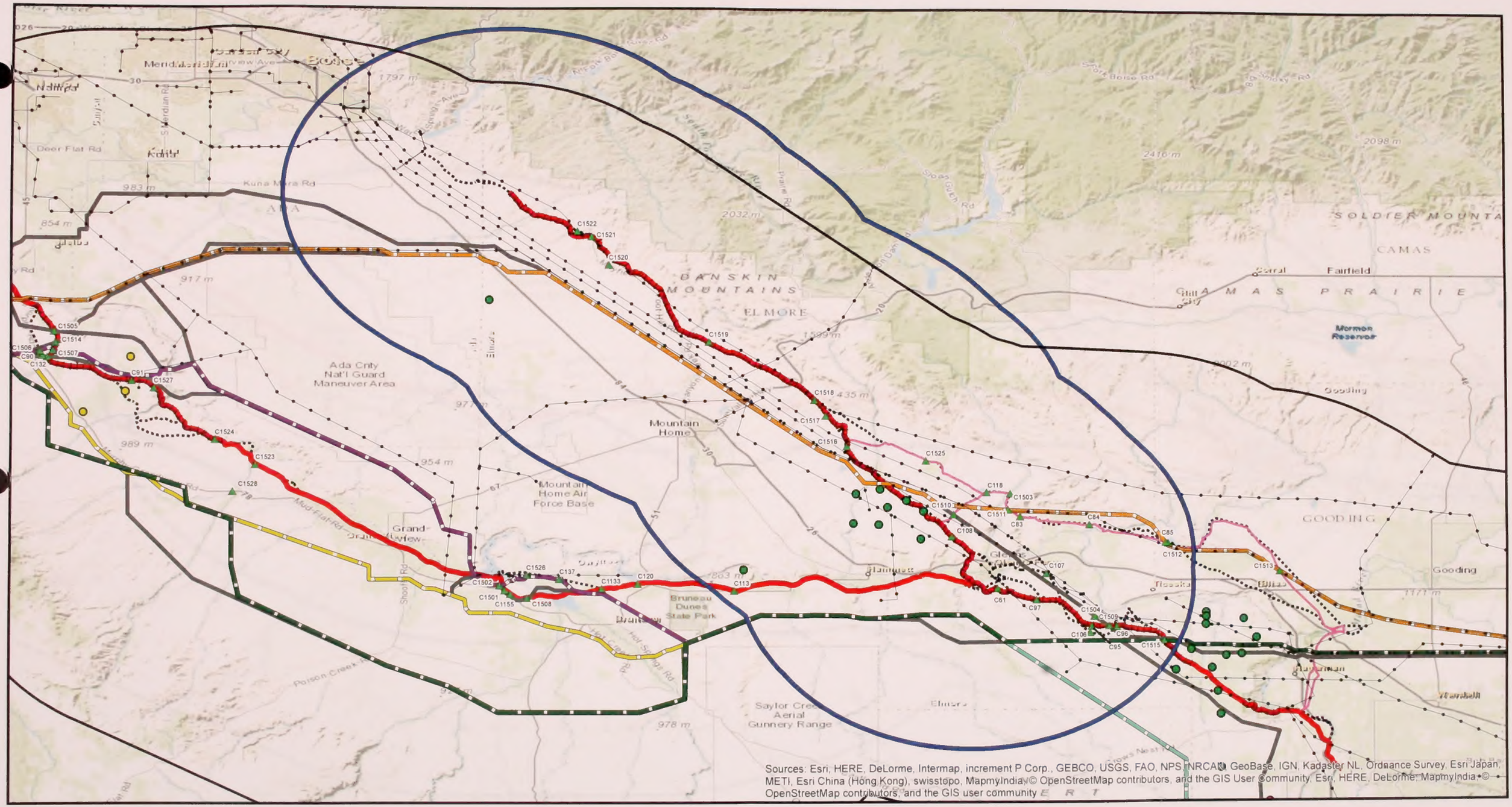

Map Area

0 5
Miles
GCS WGS 1984

Oregon Trail Features
- HPRSEG
- Oregon Trail (NHT[1])
- North Alternate Study Trail
- Associated Trail Segments (NHT[2])

- Cummulative Impact Area
- KOPs
- AU2
- Substation

Project Features
- Alternative 8G
- Alternative 9K
- Segment 8 Rev. Prop. Rte.
- Segment 9 Rev. Prop. Rte.
- FEIS Proposed Route 9
- Route 8H
- Other 2013 FEIS Routes

Existing Modifications

Windfarms
- Proposed
- In Permitting Process
- Operating
- Existing Transmission Lines (+100kV)

Gateway West
Transmission Line Project
Draft Supplemental EIS

Cumulative Impacts Map AU2
OR TR. Feats., Proj. Feats., and Existing Mods.

Figure E-4

Sources | BLM, Esri, Idaho Power, NPS, USFS, USGS, Ventyx

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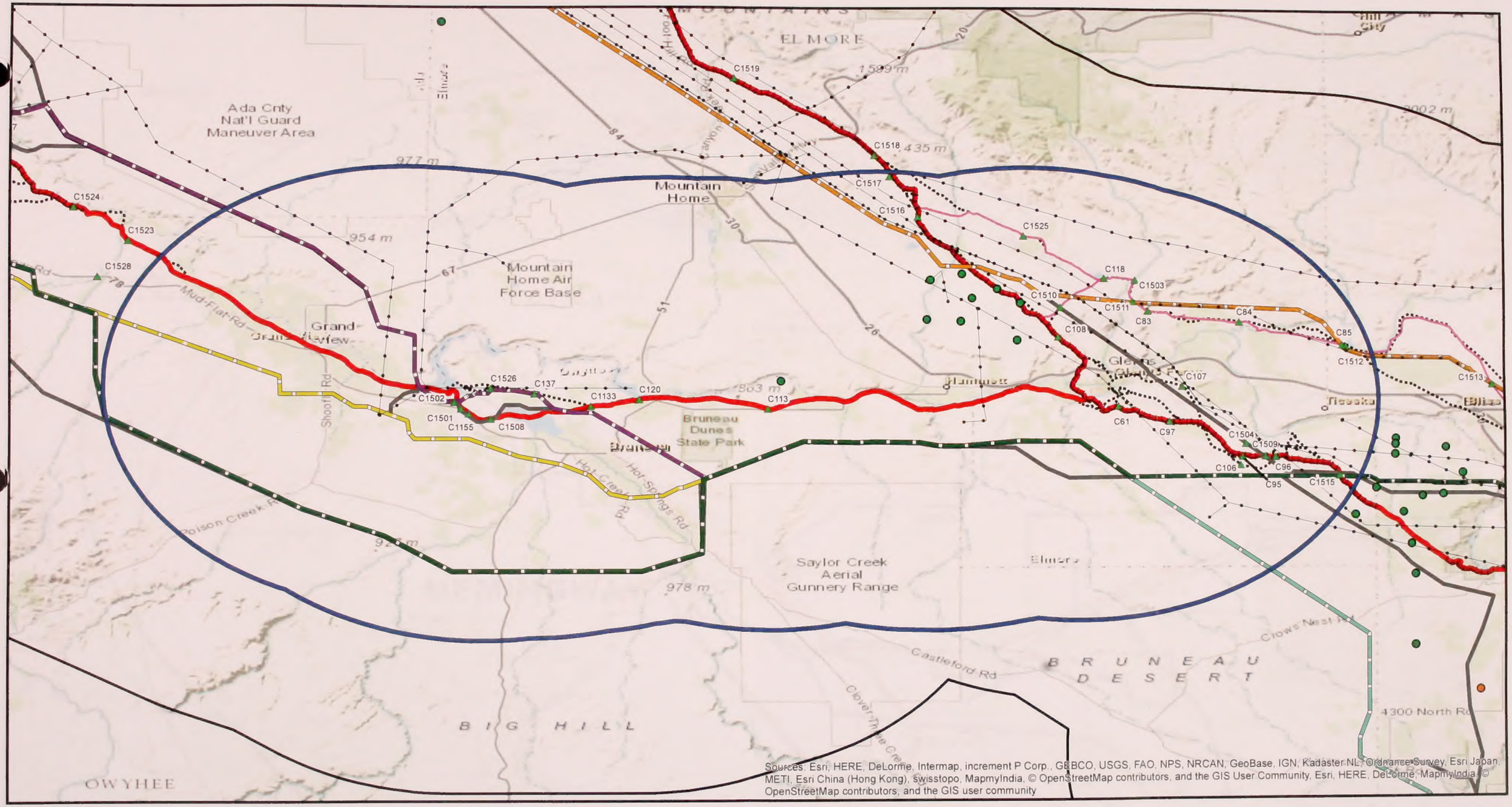

Map Area

0 2
Miles
GCS WGS 1984

Oregon Trail Features
- HPRSEG
- Oregon Trail (NHT[1])
- North Alternate Study Trail
- Associated Trail Segments (NHT[2])

- Cummulative Impact Area
- KOPs
- AU3
- Substation

Project Features
- Alternative 8G
- Alternative 9K
- Segment 8 Rev. Prop. Rte.
- Segment 9 Rev. Prop. Rte.
- FEIS Proposed Route 9
- Route 8H
- Other 2013 FEIS Routes

Existing Modifications

Windfarms
- Proposed
- In Permitting Process
- Operating
- Existing Transmission Lines (+100kV)

Gateway West
Transmission Line Project
Draft Supplemental EIS

Cumulative Impacts Map AU3
OR TR. Feats., Proj. Feats., and Existing Mods.

Figure E-5

Sources | BLM, Esri, Idaho Power, NPS, USFS, USGS, Ventyx

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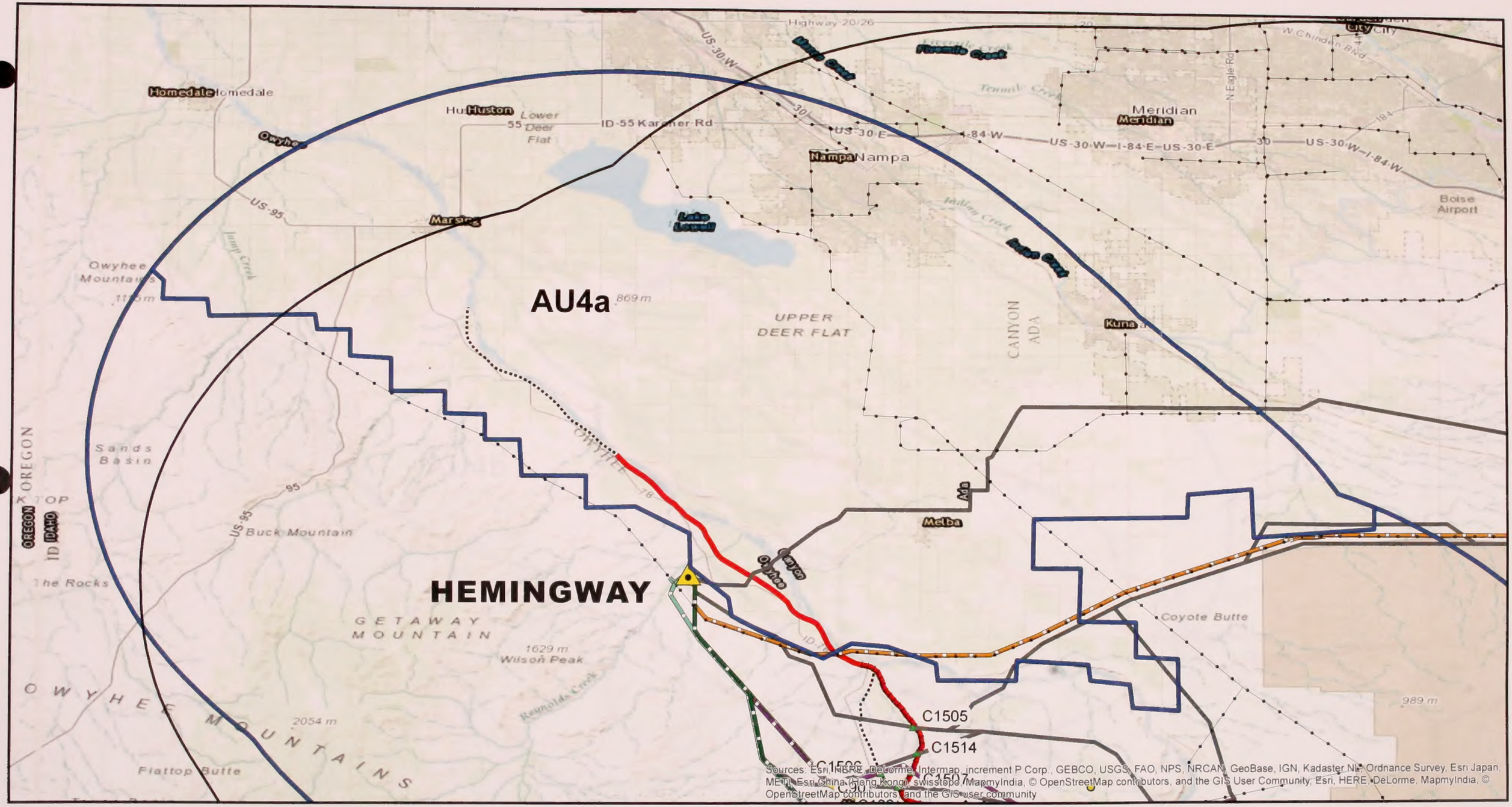


Map Area

0 2 Miles

NAD 1983 Idaho TM

Oregon Trail Features

- HPRSEG
- Oregon Trail (NHT[1])
- North Alternate Study Trail
- Associated Trail Segments (NHT[2])

- Cummulative Impact Area
- KOPs
- AU4
- Substation

Project Features

- Alternative 8G
- Alternative 9K
- Segment 8 Rev. Prop. Rte.
- Segment 9 Rev. Prop. Rte.
- FEIS Proposed Route 9
- Route 8H
- Other 2013 FEIS Routes

Existing Modifications

Windfarms

- Proposed
- In Permitting Process
- Operating

- Existing Transmission Lines (+100kV)

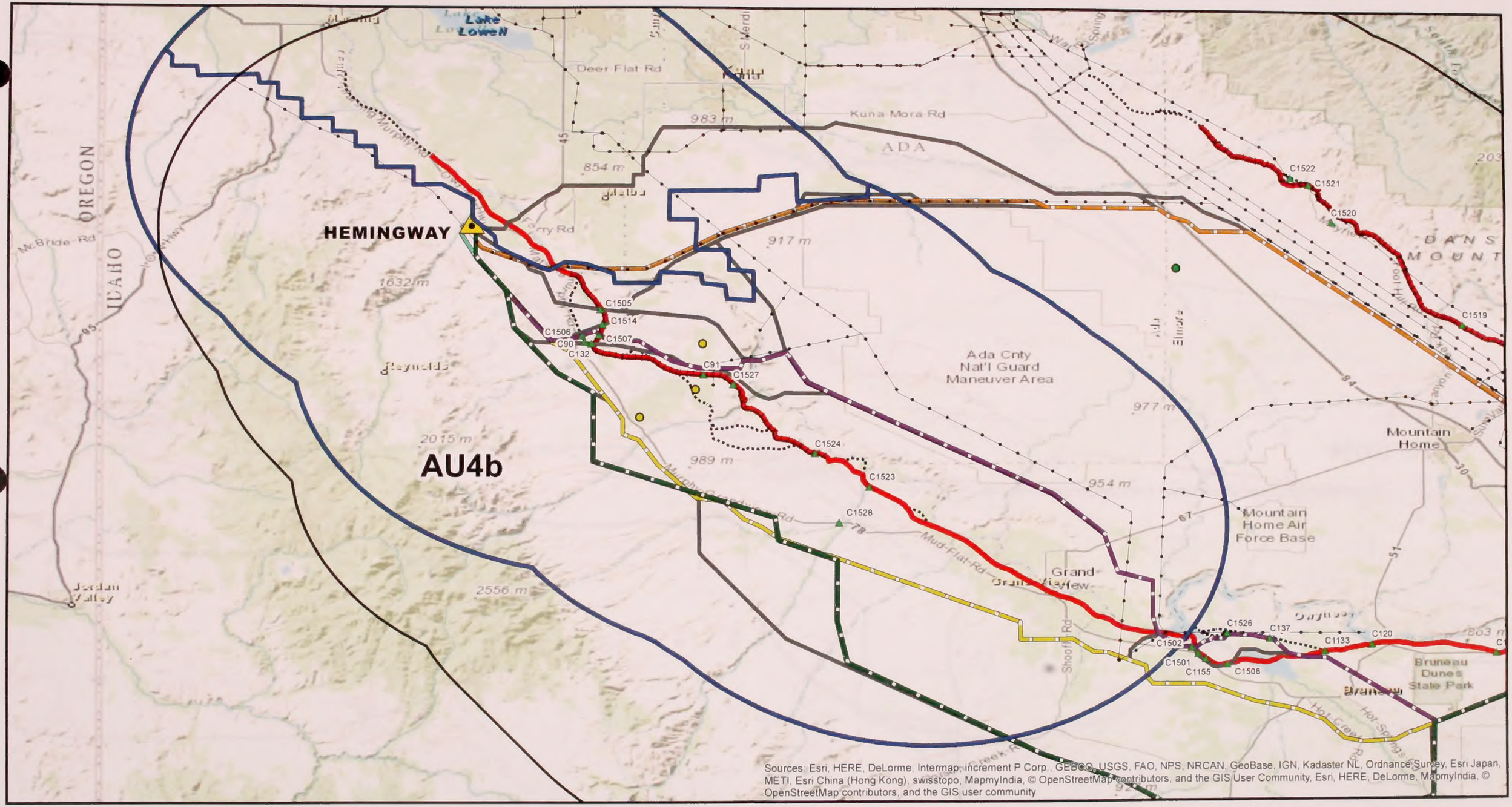
Gateway West
Transmission Line Project
Draft Supplemental EIS

Cumulative Impacts Map AU4a
OR TR. Feats., Proj. Feats., and Existing Mods.

Figure E-6

Sources | BLM, Esri, Idaho Power, NPS, USFS, USGS, Ventyx

K:\22240030 Gateway West EIS_MXD\TrailsReport_CumulativeImpactsMaps_20150610.mxd leesa_gratreak 1/13/2016



Map Area

0 5
Miles
GCS WGS 1984

Oregon Trail Features
- HPRSEG
- Oregon Trail (NHT[1])
- North Alternate Study Trail
- Associated Trail Segments (NHT[2])

- Cummulative Impact Area
- KOPs
- AU4
- Substation

Project Features
- Alternative 8G
- Alternative 9K
- Segment 8 Rev. Prop. Rte.
- Segment 9 Rev. Prop. Rte.
- FEIS Proposed Route 9
- Route 8H
- Other 2013 FEIS Routes

Existing Modifications

Windfarms
- Proposed
- In Permitting Process
- Operating
- Existing Transmission Lines (+100kV)

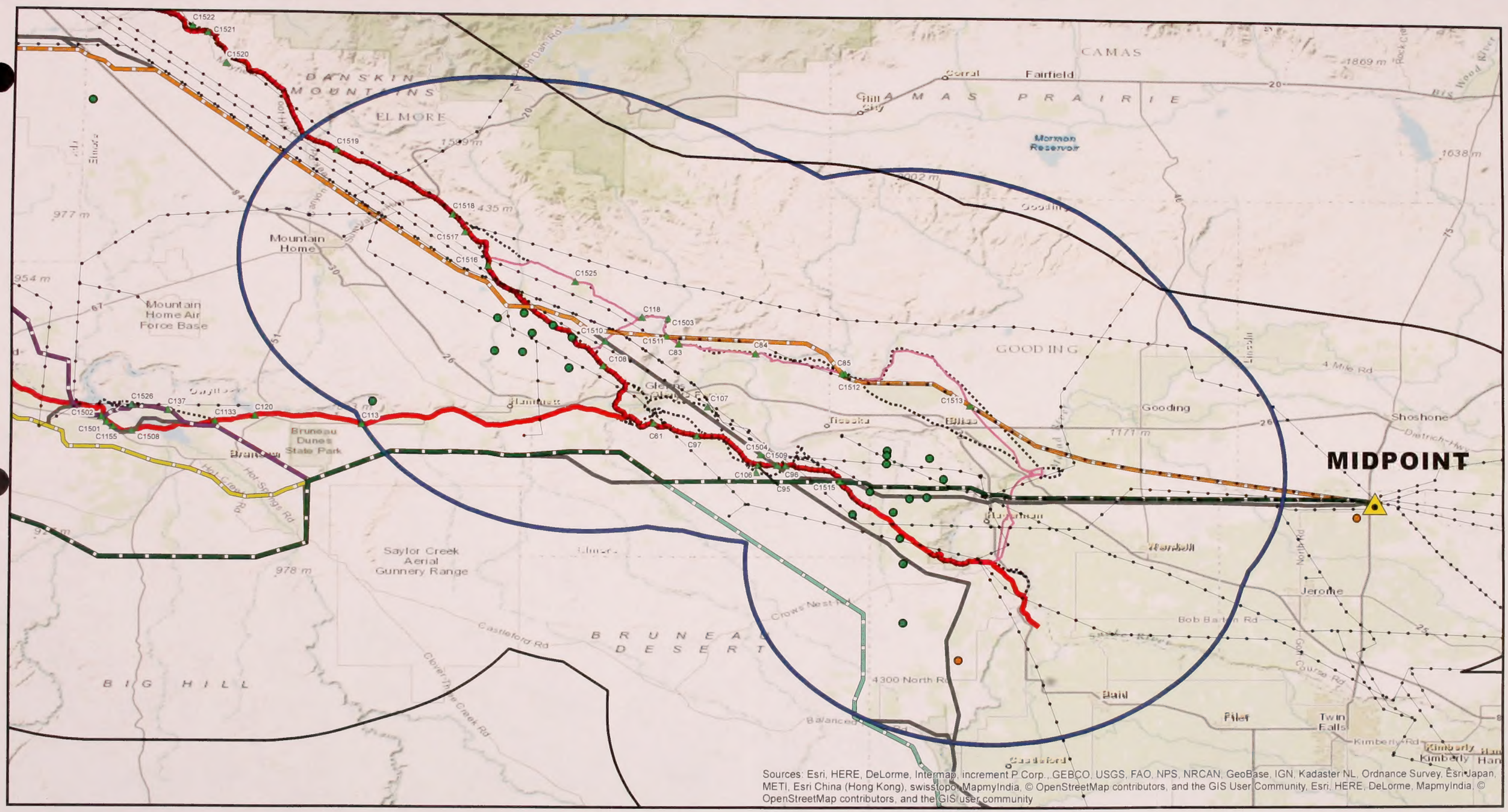
Gateway West
Transmission Line Project
Draft Supplemental EIS

Cumulative Impacts Map AU4b
OR TR. Feats., Proj. Feats., and Existing Mods.

Figure E-7

Sources | BLM, Esri, Idaho Power, NPS, USFS, USGS, Ventyx

K:\22240030 Gateway West EIS_MXD\TrailsReport_CumulativeImpactsMaps_20150610.mxd leesa_gratreak 1/13/2016



Map Area

0 5
Miles
GCS WGS 1984

Oregon Trail Features
- HPRSEG
- Oregon Trail (NHT[1])
- North Alternate Study Trail
- Associated Trail Segments (NHT[2])

- Cummulative Impact Area
- KOPs
- AU5
- Substation

Project Features
- Alternative 8G
- Alternative 9K
- Segment 8 Rev. Prop. Rte.
- Segment 9 Rev. Prop. Rte.
- FEIS Proposed Route 9
- Route 8H
- Other 2013 FEIS Routes

Existing Modifications

Windfarms
- Proposed
- In Permitting Process
- Operating

- Existing Transmission Lines (+100kV)

Gateway West
Transmission Line Project
Draft Supplemental EIS

Cumulative Impacts Map AU5
OR TR. Feats., Proj. Feats., and Existing Mods.

Figure E-8

Sources | BLM, Esri, Idaho Power, NPS, USFS, USGS, Ventyx

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Attachment F
IOP-KOP Impacts Table

National Historic Trail IOP-KOP Impacts Table

IOP/ KOP	Site Name	BLM Field Office	Site Type	Distance from IOP/KOP to Existing Cultural Modifications (Other Landscape Elements)	VRI Class/ VRM Class	Within SRBOP (Y/N)	Project Route Segment	Distance from IOP/ KOP to VISIBLE Project Segment	Visual Contrast Rating	Impact – Scenic/ Visual	Impact – Cultural/ Historic	Impact - Recreation	Impact – Natural	Recom-mended EPMs and Mitigation
Analysis Unit 1														
C1515	OT Crossing-Route 8G	Jarbidge	Visual; Cultural	Wind farm 2 mi. S and SE; Transmission line 0.8 mi. E and 1.3 mi. SW.	VRI II VRM 1	N	Route 8G/ Route 8H (overlap)	0.1 mi. S	Strong	Moderate	Adverse	Low	None	Y
							Route 8A (FEIS)	0.1 mi. N	Strong	Moderate	Adverse	Low	None	Y
							Route 9B (FEIS)	2 mi. SW	Weak	Low	Adverse (Skylines)	Low	None	Y
C96	Oregon NHT (a portion coincides with Kelton Road)	Jarbidge	Visual; Cultural	10 Wind farms avg. 7 mi. SE. Transmission lines 0.5 mi. E, 1 mi.NE and 1 mi. E	VRI II VRM 1	N	Route 8A (FEIS)	1.5 mi.SE	Weak	Low	Adverse	Moderate	None	Y
							Route 8G/ Route 8H (overlap)	2 mi. SE	Weak	Low	No Adverse Impact	Low	None	N
							Route 9B (FEIS)	3.45 mi. SW	Weak	Low	No Adverse Impact	Low	None	N
C106	Oregon NHT Trail Marker, near Bell Rapids Road	Jarbidge	Visual; Cultural; Historic Property	Transmission lines 1.9 mi. NE; Wind farm 5 mi. E on horizon.	VRI II VRM 1	N	Route 9B (FEIS)/ Route 8G/ Route 8H (overlap)	0.8 mi. S	Strong	Moderate	Adverse	Low	None	Y
							Route 8A (FEIS)	1.9 mi. NE	Moderate	Low	No Adverse Impact	Low	None	N
							FEIS Prop. Rote 9/ Rev. Prop. Route 9/ Route 9K (overlap)	4.5 mi. SW	Weak	Low	No Adverse Impact	Low	None	N
C95	Oregon NHT (West Deer Creek Gulch)	Jarbidge	Visual; Cultural; Historic Property	Fence, petroleum pipelines, wind farm, existing transmission line	VRI II VRM 1	N	Route 8A (FEIS)	0.8 mi. NE	Moderate	Low	Adverse	Moderate	None	Y
							Route 8G/ Route 8H/ Route 9B (FEIS) (overlap)	1.4 mi. S	Moderate	Low	Adverse	Moderate	None	Y

IOP/ KOP	Site Name	BLM Field Office	Site Type	Distance from IOP/KOP to Existing Cultural Modifications (Other Landscape Elements)	VRI Class/ VRM Class	Within SRBOP (Y/N)	Project Route Segment	Distance from IOP/ KOP to VISIBLE Project Segment	Visual Contrast Rating	Impact – Scenic/ Visual	Impact – Cultural/ Historic	Impact - Recreation	Impact – Natural	Recom-mended EPMs and Mitigation
C1509	OT Crossing-Route 8A	Jarbidge	Cultural	Wind farms 6 mi. SE and 12 mi. W; Transmission lines 0.6 mi. NE.	VRI II VRM 1	N	Route 8A (FEIS)	crossing	Strong	Moderate	Adverse	Moderate	None	Y
							Route 8H	1.4 mi. S	Moderate/ No Change	Low	Adverse	Moderate	None	Y
C1504	380-1 Alternate Route OT	Jarbidge	Cultural	Wind farms 7 mi. E and SE, and 14 mi. NW; Transmission lines 0.6 mi. NE.	VRI II VRM 4	N	Route 8A (FEIS)	crossing	Moderate	Low	Adverse	Low	None	Y
							Route 9B (FEIS) / Route 8G/ Route 8H (overlap)	2.2 mi. S	Moderate	Low	No Adverse Impact	Low	None	N
C97	Oregon NHT (Rosevear Gulch area)	Jarbidge	Visual; Cultural; Historic Property	Transmission line 2 mi. NE.	VRI II VRM 1	N	Route 8A (FEIS)	1.63 mile NE	Weak	Low	No Adverse Impact	Low	None	N
							Route 8G/ Route 8H (overlap)	3.8 miles S	Weak	Low	No Adverse Impact	Low	None	N
							FEIS Prop. Route 9/ Rev. Prop. Route 9 / Routes 9K/9B (overlap)	4.3 miles SW	Weak	Low	No Adverse Impact	Low	None	N
C107	Kelton Road Marker	Jarbidge	Cultural	Wind farms 9 mi. NW; Transmission lines 0.2 mi. NE; Communication tower 2 mi. S; 3 Cellular towers 1 mi. N and NE.	VRI III VRM 1	N	Route 8A (FEIS)	0.6 mi. SW	Strong	Moderate	Adverse	Low	None	Y
C61	Oregon NHT (SE of Three Island Crossing)	Jarbidge	Visual; Cultural (contri-buting); Recreation (ATR)	Transmission lines 0.3 and 0.5 mi. NE.	VRI III VRM 1	N	Route 8G/ Route 8H/ FEIS Prop. Route 9/ Rev. Prop. Route 9 / Route 9K (overlap)	3.2 mi. SW	Weak	Low	No Adverse Impact	Low	None	N

IOP/ KOP	Site Name	BLM Field Office	Site Type	Distance from IOP/KOP to Existing Cultural Modifications (Other Landscape Elements)	VRI Class/ VRM Class	Within SRBOP (Y/N)	Project Route Segment	Distance from IOP/ KOP to VISIBLE Project Segment	Visual Contrast Rating	Impact – Scenic/ Visual	Impact – Cultural/ Historic	Impact - Recreation	Impact – Natural	Recom-mended EPMs and Mitigation
							Route 8A (FEIS)	2.7 miles NE	Weak	Low	No Adverse Impact	Low	None	N
Analysis Unit 2														
C108	Oregon NHT Marker off of Bennett Mountain Road	Four Rivers	Visual; Cultural; Historic Property	Transmission lines 1 mi. NE and 2.7 mi. NE	VRI III VRM 1	N	Route 8A (FEIS)	1.5 mi. NE	Weak	Low	No Adverse Impact	Low	None	N
							Rev. Prop. Route 8/FEIS Prop. Route 8(overlap)	2.8 mi. N	Weak	Low	No Adverse Impact	Low	None	N
C1516	Alkali Springs Historic Camping Area	Four Rivers	Cultural; Recreation	Transmission lines 0.5 and 0.9 mi. SW; Wind farms 4 to 10 mi. SE	VRI III VRM 1	N	Rev. Prop. Route 8 / Route 8A (FEIS) / FEIS Prop. Route 8(overlap)	1.3 mi. SW	Weak	Low	No Adverse Impact	Low	None	N
C1517	Kelton Rd Recreation Site-Hot Springs Creek	Four Rivers	Cultural; Recreation	Transmission lines 1 mi. SW, 1.7 mi. SW, 2.5 mi. SW	VRI III VRM 1	N	Rev. Prop. Route 8 / Route 8A (FEIS) / FEIS Prop. Route 8(overlap)	2.5 mi. SW	Weak	Low	No Adverse Impact	Low	None	N
C1518	Kelton Rd Recreation Site-Parallels OT Segment	Four Rivers	Cultural; Recreation	Transmission lines 1.7 SW mi., 2.3 mi. SW, 3.1 mi. SW, .1 mi. N; Communication tower 2+ mi. NW; Wind farm 9 mi. SE.	VRI III VRM 1	N	Rev. Prop. Route 8 / Route 8A (FEIS) / FEIS Prop. Route 8(overlap)	3.3 mi. SW	Weak	Low	No Adverse Impact	Low	None	N
C1519	Rocky Road Hiking Area and Trail Ruts	Four Rivers	Cultural; Recreation	Transmission lines 0.9 mi. SW, 1.5 mi. SW, 2.3 mi. SW, 0.7 mi. N	VRI III VRM 1	N	Rev. Prop. Route 8 / Route 8A (FEIS) / FEIS Prop. Route 8(overlap)	2.6 mi. SW	Weak	Low	No Adverse Impact	Low	None	N

IOP/ KOP	Site Name	BLM Field Office	Site Type	Distance from IOP/KOP to Existing Cultural Modifications (Other Landscape Elements)	VRI Class/ VRM Class	Within SRBOP (Y/N)	Project Route Segment	Distance from IOP/ KOP to VISIBLE Project Segment	Visual Contrast Rating	Impact – Scenic/ Visual	Impact – Cultural/ Historic	Impact - Recreation	Impact – Natural	Recom-mended EPMs and Mitigation
C1520	Interpretive Sign and Visible Ruts	Four Rivers	Cultural	Transmission lines 1.7 mi. SW, 2.3 mi. SW, 3.1 mi. SW, 0.6 mi. N	VRI III VRM 1	N	Rev. Prop. Route 8 / Route 8A (FEIS) / FEIS Prop. Route 8(overlap)	3.3 mi. SW	Weak	Low	No Adverse Impact	Low	None	N
C1521	Byway Road Parallels OT Route	Four Rivers	Recreation	Transmission lines0.2 mi. SW, 2.9 mi. SW, 3.4 mi. SW, 4.2 mi. SW.	VRI III VRM 1	N	Rev. Prop. Route 8 / Route 8A (FEIS) / FEIS Prop. Route 8 (overlap)	4.5 mi. SW	Weak	Low	No Adverse Impact	Low	None	N
C1522	Interpretive Sign and Historic Inscription Point	Four Rivers	Interpretation; Cultural	Distribution line follows road; Transmission lines0.1 mi. SW, 2.6 mi. SW, 3.2 mi. SW, 3.9 mi. SW; fence; road.	VRI III VRM 1	N	Rev. Prop. Route 8 / Route 8A (FEIS) / FEIS Prop. Route 8 / Route 8B (overlap)	4.3 mi. SW	Weak	Low	No Adverse Impact	Low	None	N
Analysis Unit 3														
C113	Oregon NHT South Alternate	Four Rivers	Visual; Cultural; Historic Property	ID Hwy 78 60 m S; Transmission line 60 m S; Waste transfer station 25 m south.	VRI II VRM 2	Y	Route 8G/ Route 8H/ FEIS Prop. Route 9/ Rev. Prop. Route 9/ Route 9K (overlap)	2.8 mi. SE	Weak/	Low	No Adverse Impact	Low	None	N
C120	Oregon NHT South Alternate	Four Rivers	Visual; Cultural; Historic Property	Transmission line 0.8 mi. NW	VRI II VRM 2	Y	Route 8H/ Rev. Prop. Route 9/ Routes 9D/9G (FEIS) (overlap)	2.1 mi. SW	Weak	Low	No Adverse Impact	Low	None	N

IOP/ KOP	Site Name	BLM Field Office	Site Type	Distance from IOP/KOP to Existing Cultural Modifications (Other Landscape Elements)	VRI Class/ VRM Class	Within SRBOP (Y/N)	Project Route Segment	Distance from IOP/ KOP to VISIBLE Project Segment	Visual Contrast Rating	Impact – Scenic/ Visual	Impact – Cultural/ Historic	Impact - Recreation	Impact – Natural	Recom-mended EPMs and Mitigation
C1133	Recreation View	Four Rivers	Visual; Recreation	Electrical distribution line SW and W.	VRI II VRM 1	N	Route 8H/ FEIS Prop. Route 9/ Rev. Prop. Route 9/ Routes 9G/9H (FEIS) (overlap)	0.45 mi. S	Strong	Moderate	No Adverse Impact	Moderate	None	N
C1508	OT Crossing-Route 9D	Four Rivers	Cultural	Transmission line 2 mi. N	VRI II VRM 2	Y	Route 9D/9G (FEIS) (overlap)	crossing	Strong	High	Adverse	Moderate	None	Y
							Route 9F/9H (FEIS) (overlap)	N/A (not visible)	Weak	Low	No Adverse Impact	Low	None	N
							Rev. Prop. Route 9	2.75 mi. NE	Weak	Low	No Adverse Impact	Low	None	N
C1155	Recreation View	Four Rivers	Visual; Recreation	Transmission lines 200 m N.	VRI II VRM 2	Y	Routes 9D/9G (FEIS) (overlap)	.07 mi. W	Strong	High	Adverse	Moderate	None	Y
							Route 8 H/ Rev. Prop. Route 9 (overlap)	0.48 mi. N	Strong	High	Adverse	Moderate	None	Y
C1501	CJ Strike Ruts	Four Rivers	Cultural; Recreation	Transmission lines 1.8 mi. N and 2.8 mi. NW; Hwy 78 0.1 mi. SW.	VRI II VRM 2	Y	FEIS Prop. Route 9	1.7 mi. S N/A (not visible)	Weak	Low	No Adverse Impact	Low	None	N
							Route 9D/9G (FEIS) (overlap)	0.1 mi. SW	Strong	Moderate	Adverse	Moderate	None	Y
							Route 9F/9H (FEIS)	N/A (not visible)	Weak	Low	No Adverse Impact	Low	None	N
							Rev. Prop. Route 9	0.9 mi. NW	Moderate	Low	Adverse	Moderate	None	Y

IOP/ KOP	Site Name	BLM Field Office	Site Type	Distance from IOP/KOP to Existing Cultural Modifications (Other Landscape Elements)	VRI Class/ VRM Class	Within SRBOP (Y/N)	Project Route Segment	Distance from IOP/ KOP to VISIBLE Project Segment	Visual Contrast Rating	Impact – Scenic/ Visual	Impact – Cultural/ Historic	Impact - Recreation	Impact – Natural	Recom-mended EPMs and Mitigation
C1502	Cove at CJ Strike Reservoir	Four Rivers	Recreation	CJ Strike Reservoir 200+ m N; Transmission lines: crossing trail, 1 mi. N, 1.7 mi. NW; fence crosses trail; agricultural field on trail	VRI II VRM 2	Y	FEIS Proposed Route 9	2.5 mi. S N/A (not visible)	None	None	No Impact	None	None	N
							Route 8H/ Rev. Prop. Route 9 / Routes 9D/9G (FEIS) (overlap)	crossing	Strong	Moderate	Adverse	Moderate	None	Y
							Routes 9F/9H (FEIS)	N/A (not visible)	Weak	Low	No Adverse Impact	Low	None	N
C137	Simulation Point	Four Rivers	Visual; Cultural	Oregon Trail Road (paved access road): crosses trail; Transmission lines cross trail; Agricultural fields1 mi. N	VRI II VRM 2	Y	Route 8H/ FEIS Prop. Route 9/ Rev. Prop. Route 9 (overlap)	crossing	Moderate	Low	No Adverse Impact	Low	None	N
							Routes 9D/9G/9H (FEIS) (overlap)	N/A (not visible)	Weak	Low	No Adverse Impact	Low	None	N
C1526	North Side of CJ Strike Reservoir	Four Rivers	Cultural	Transmission line 100 m S.	VRI II VRM 2	Y	Rev. Prop. Route 9	0.1 mi. S	Strong	Moderate	Adverse	Moderate	None	Y
							Routes 9D/9G (FEIS) (overlap)	1.4 mi. SE	Weak	Low	No Adverse Impact	Low	None	N
Analysis Unit 4														
C1528	Utter Massacre Site (HPHS)	Owyhee	Cultural		VRI II VRM 4	N	FEIS Proposed Route 9/ Routes 9K/8G (overlap)	2.3 mi. SW	Weak	Low	No Adverse Impact	Low	None	N

IOP/ KOP	Site Name	BLM Field Office	Site Type	Distance from IOP/KOP to Existing Cultural Modifications (Other Landscape Elements)	VRI Class/ VRM Class	Within SRBOP (Y/N)	Project Route Segment	Distance from IOP/ KOP to VISIBLE Project Segment	Visual Contrast Rating	Impact – Scenic/ Visual	Impact – Cultural/ Historic	Impact - Recreation	Impact – Natural	Recom-mended EPMs and Mitigation
C1523	OT Castle Butte Landmark	Four Rivers	Visual Resource	Transmission line 4.4 mi. NE; barbed wire fence crosses trail. Hazardous waste landfill 2 mi. S.	VRI II VRM 2	Y	Route 8 H/ Rev. Prop. Route 9/ Routes 8E/ 9D/9F/9G/ 9H (FEIS) (overlap)	4.4 mi. NE	Weak	Low	No Adverse Impact	Low	None	N
C1524	Wild Horse Butte	Four Rivers	Visual Resource	Transmission line 3.9 mi. NE; power lines 2+ mi. SE.	VRI II VRM 2	Y	Route 8H/ Rev. Prop. Route 9/ Routes 9D/9F/9G/9 H (FEIS) (overlap)	3.9 mi. NE	Weak	Low	No Adverse Impact	Low	None	N
							Routes 8G/9K (overlap)	4.74 mi. SW	Weak	Low	No Adverse Impact	Low	None	N
C1527	HPSEG Near Sinker Creek Butte	Four Rivers	Cultural	Two-track road on trail; Transmission line 1 mi. N.	VRI II VRM 2	Y	Routes 9G/9H (FEIS) (overlap)	0.4 mi. NE	Strong	Moderate	Adverse	Moderate	None	Y
							Route 8 H/ Rev. Prop. Route 9 (overlap)	1.1 mi. N	Strong	Moderate	Adverse	Moderate	None	Y
						Y	Routes 8E/9D/9F (FEIS) (overlap)	1.9 mi. NE	Moderate	Low	No Adverse Impact	Low	None	N
C91	Oregon NHT South Alternate Sinker Creek Butte Area	Four Rivers	Visual; Cultural; Historic Property	Transmission lines 0.5 mi. E, 4 mi. NE	VRI II VRM 2	Y	Routes 9G/9H (FEIS) (overlap)	0.5 mi. N	Strong	Moderate	Adverse	Moderate	None	Y
							Routes 8E (FEIS), 9D/9F	2.3 mi. NE	Weak	Low	No Adverse Impact	Low	None	N
							Route 8H/ Rev. Prop. Route 9 (overlap)	0.5 mi. N	Strong	Moderate	Adverse	Moderate	None	Y

IOP/ KOP	Site Name	BLM Field Office	Site Type	Distance from IOP/KOP to Existing Cultural Modifications (Other Landscape Elements)	VRI Class/ VRM Class	Within SRBOP (Y/N)	Project Route Segment	Distance from IOP/ KOP to VISIBLE Project Segment	Visual Contrast Rating	Impact – Scenic/ Visual	Impact – Cultural/ Historic	Impact - Recreation	Impact – Natural	Recom-mended EPMs and Mitigation
C132	Simulation Point	Four Rivers	Visual; Cultural	Transmission lines 4.6 mi. N, 6.8 mi. SE	VRI II VRM 2	Y	Route 8H/ Rev. Prop. Route 9 (overlap)	crossing	Strong	Moderate	Adverse	Moderate	None	Y
							Routes 9D/9F (FEIS) (overlap)	0.2 mi. NW	Strong	Moderate	Adverse	Moderate	None	Y
							Routes 9G/9H (FEIS) (overlap)	0.5 mi. S	Strong	Moderate	Adverse	Moderate	None	Y
							FEIS Prop. Route 9	1.2 mi. SW	Weak	Low	No Adverse Impact	Low	None	N
							FEIS Prop. Route 8/ Route 8E (FEIS) (overlap)	2.0 mi. N	Weak	Low	No Adverse Impact	Low	None	N
C1507	OT Crossing-Route 9G	Four Rivers	Cultural	Town of Murphy 0.3 mi. S; ID Hwy 78 0.3 mi. S; Earthen dam 100 ft. N.	VRI II VRM 2	Y	Route 8H/ Rev. Prop. Route 9 (overlap)	0.81 mi. NE	Moderate	Low	No Adverse Impact	Low	None	N
							Route 9D/9F (FEIS) (overlap)	1.32 mi. NE	Moderate	Low	No Adverse Impact	Low	None	N
							Routes 9G/9H (FEIS) (overlap)	crossing	Strong	Moderate	No Adverse Impact	Low	None	N
							FEIS Prop. Route 9	1.3 mi. SW	Weak	Low	No Adverse Impact	Low	None	N
							FEIS Prop. Route 8	2.5 mi. NE	Weak	Low	No Adverse Impact	Low	None	N

IOP/ KOP	Site Name	BLM Field Office	Site Type	Distance from IOP/KOP to Existing Cultural Modifications (Other Landscape Elements)	VRI Class/ VRM Class	Within SRBOP (Y/N)	Project Route Segment	Distance from IOP/ KOP to VISIBLE Project Segment	Visual Contrast Rating	Impact – Scenic/ Visual	Impact – Cultural/ Historic	Impact - Recreation	Impact – Natural	Recom-mended EPMs and Mitigation
C1514	OT Crossing-Rev. Prop. Route 9	Four Rivers	Cultural	Town of Murphy 1 mi. S; ID Hwy 78 S; Con Shea Road W.	VRI II VRM 2	Y	Rev. Prop. Route 9	crossing	Strong	Moderate	Adverse	Moderate	None	Y
							Routes 9D/9F (FEIS) (overlap)	0.7 mi. NE	Strong	Moderate	Adverse	Low	None	Y
							Routes 9G/9H (FEIS) (overlap)	0.7 mi. SW	Strong	Moderate	No Adverse Impact	Low	None	N
							FEIS Prop. Route 9	1.8 mi. SW	Moderate	Low	No Adverse Impact	Low	None	N
							FEIS Prop. Route 8	1.7 mi. NE	Moderate	Low	No Adverse Impact	Low	None	N
C1505	OT Crossing-FEIS Prop. Route 8	Four Rivers	Cultural	On-site OHV trail; Ranch 1 mi. NW	VRI II VRM 2	Y	FEIS Prop. Route 8	crossing	Strong	Moderate	Adverse	Moderate	None	Y
							Route 8H/ Rev. Prop. Route 9 (overlap)	1.6 mi. S	Moderate	Low	No Adverse Impact	Low	None	N
							FEIS Proposed Route 9	3.2 mi W and SW	Weak	Low	No Adverse Impact	Low	None	N
							Route 8E (FEIS)	1 mi. E	Strong	Moderate	No Adverse Impact	Low	None	N
							Routes 9D/9F (FEIS) (overlap)	1.1 mi. S	Moderate	Low	No Adverse Impact	Low	None	N
							Routes 9G/9H (FEIS) (overlap)	2.4 mi. S	Weak	Low	No Adverse Impact	Low	None	N

IOP/ KOP	Site Name	BLM Field Office	Site Type	Distance from IOP/KOP to Existing Cultural Modifications (Other Landscape Elements)	VRI Class/ VRM Class	Within SRBOP (Y/N)	Project Route Segment	Distance from IOP/ KOP to VISIBLE Project Segment	Visual Contrast Rating	Impact – Scenic/ Visual	Impact – Cultural/ Historic	Impact - Recreation	Impact – Natural	Recom-mended EPMs and Mitigation
C90	Oregon NHT South Alternate Snake River Birds of Prey	Four Rivers	Cultural; Historic Property	Town of Murphy 1 mi. S; Transmission line 6.5 mi. SE	VRI II VRM 2	Y	Routes 9G/9H (FEIS) (overlap)	0.1 mi. S	Strong	Moderate	Adverse	Moderate	None	Y
							Routes 9D/9F (FEIS) (overlap)	0.2 mi. NW	Strong	Moderate	Adverse	Low	None	Y
							Route 8H/ Rev. Prop. Route 9 (overlap)	0.4 mi. NW	Strong	Moderate	Adverse	Low	None	Y
							Route 9I (FEIS)	N/A (not visible)	Weak to Moderate	Low	No Adverse Impact	Low	None	N
							Rev. Prop. Route 8	2.3 mi. N	Weak	Low	No Adverse Impact	Low	None	N
							FEIS Prop. Route 9	1-2 mi. S and SW	Weak	Low	No Adverse Impact	Low	None	N
							FEIS Prop. Route 8	2.3 mi. N	Weak	Low	No Adverse Impact	Low	None	N
C1506	OT Crossing-Route 9D	Four Rivers	Cultural	N/A	VRI II VRM 2	Y	Routes 9G/9H (FEIS) (overlap)	1.4 mi. S	Weak	Low	No Adverse Impact	Low	None	N
							FEIS Prop. Route 8	1.1 mi. N	Moderate	Low	No Adverse Impact	Low	None	N
							Routes 9D/9F (FEIS) (overlap)	crossing	Strong	Moderate	Adverse	Moderate	None	Y
							Rev. Prop. Route 8	N/A (not visible)	Weak	Low	No Impact	Low	None	N
							Route 8E (FEIS)	1.3 mi. NE	Moderate	Low	No Adverse Impact	Low	None	N

IOP/ KOP	Site Name	BLM Field Office	Site Type	Distance from IOP/KOP to Existing Cultural Modifications (Other Landscape Elements)	VRI Class/ VRM Class	Within SRBOP (Y/N)	Project Route Segment	Distance from IOP/ KOP to VISIBLE Project Segment	Visual Contrast Rating	Impact – Scenic/ Visual	Impact – Cultural/ Historic	Impact - Recreation	Impact – Natural	Recom-mended EPMs and Mitigation
							FEIS Prop. Route 9/ Rev. Prop. Route 9 (overlap)	0.6 mi. SW	Moderate	Low	No Adverse Impact	Low	None	N
Analysis Unit 5														
C1513	OT Crossing-Rev. Prop. Route 8	Shoshone	Cultural	Transmission line crosses trail; wind farms 5 mi. SW. Grain silos 2 mi. S.	VRI III VRM 3	N	Rev. Prop. Route 8/FEIS Prop. Route 8(overlap)	crossing	Moderate	Low	Adverse	Moderate	None	Y
C1512	OT Crossing-Rev. Prop. Route 8	Shoshone	Cultural	Transmission line .26 mi. SW	VRI III VRM 2	N	Rev. Prop. Route 8/FEIS Prop. Route 8(overlap)	crossing	Moderate	Low	Adverse	Moderate	None	Y
C85	Oregon NHT North Alternate Pioneer Reservoir	Shoshone	Visual; Cultural; Historic Property	Transmission line 0.3 mi. S; Wind farms 7 mi. SE; Pioneer Reservoir 150 m E; House1 mi. NE on hilltop overlooking reservoir.	VRI III VRM 2	N	Rev. Prop. Route 8/FEIS Prop. Route 8(overlap)	0.1 mi. W and SW	Moderate	Low	Adverse	Moderate	None	Y
C84	Oregon NHT North Alternate King Hill	Shoshone	Visual; Cultural; Historic Property	BLM road crosses trail; agricultural field on trail; fence parallel to BLM road; transmission lines 0.1 mi. N and 0.8 mi. N	VRI III VRM 2	N	Rev. Prop. Route 8/FEIS Prop. Route 8(overlap)	1.0 mi. N	Moderate	Weak	Adverse	Low	None	Y
C83	Oregon NHT North Alternate Canyon Creek near Stage Station	Four Rivers	Visual; Cultural; Historic Property; Recreation	King Hill Rd crosses trail; transmission towers 0.5 mi. N; transmission lines 1.8 mi. SE; wind farms 6.4 mi. S.	VRI III VRM 1	N	Rev. Prop. Route 8 /FEIS Prop. Route 8(overlap)	0.5 mi. N	Moderate	Low	Adverse	Moderate	None	Y
							Route 8A (FEIS)	N/A (not visible)	Weak	Low	No Adverse Impact	Low	None	N

IOP/ KOP	Site Name	BLM Field Office	Site Type	Distance from IOP/KOP to Existing Cultural Modifications (Other Landscape Elements)	VRI Class/ VRM Class	Within SRBOP (Y/N)	Project Route Segment	Distance from IOP/ KOP to VISIBLE Project Segment	Visual Contrast Rating	Impact – Scenic/ Visual	Impact – Cultural/ Historic	Impact - Recreation	Impact – Natural	Recom-mended EPMs and Mitigation
C1511	OT Crossing-Rev. Prop. Route 8	Four Rivers	Cultural	King Hill Rd crosses trail; Transmission line crosses trail; Wind farms 6.4 mi. SW	VRI III VRM 1	N	Rev. Prop. Route 8/FEIS Prop. Route 8(overlap)	crossing	Strong	Moderate	Adverse	Moderate	None	Y
							Route 8A (FEIS)	2.8 mi. SW	Weak	Low	No Adverse Impact	Low	None	N
C1503	Emigrant Reservoir	Four Rivers	Recreation	Transmission lines 1.2 mi. S, 2.9 mi, SW, 4.2 mi. SW; N. Berry Ranch Road (gravel road) crosses trail; Emigrant Reservoir, at trail; Wind farms 7.3 mi. SW	VRI III VRM 1	N	Rev. Prop. Route 8/FEIS Prop. Route 8(overlap)	1.5 mi. S	Moderate	Low	Adverse	Moderate	None	Y
							Route 8A (FEIS)	4 mi. SW	Weak	Low	No Adverse Impact	Low	None	N
C118	Oregon NHT North Alternate south side of Blair Trail Reservoir	Four Rivers	Visual; Cultural; Historic Property	Transmission lines 1.5 mi. S, 1.9 mi, and 3.3 mi. SW; Wind farms 4.5 mi. SW	VRI III VRM 1	N	Rev. Prop. Route 8/ FEIS Prop. Route 8(overlap)	1.5 mi. S (beyond existing H-frame and 500 kV lattice tower).	Weak	Low	No Adverse Impact	Low	None	N
							Route 8A (FEIS)	3.0 mi. SW	Weak	Low	No Adverse Impact	Low	None	N
C1510	OT Crossing-Route 8A	Four Rivers	Visual; Cultural	Transmission lines 1 mi. N; Wind farms 3.1 mi. SW.	VRI III VRM 1	N	Rev. Prop. Route 8/FEIS Prop. Route 8(overlap)	0.8 mi. N	Weak	Low	No Adverse Impact	Low	None	N
							Route 8A (FEIS)	crossing	Moderate	Low	Adverse	Low	None	N
C1525	Study Trail Segment between Bennett Creek and Cold Springs Creek	Four Rivers	Cultural	Transmission lines 1 and 2.4 mi. SW; wind farms 4 mi. S and SE.	VRI III VRM 1	N	Rev. Prop. Route 8/ FEIS Prop. Route 8(overlap)	2.9 mi. SW	Weak	Low	No Adverse Impact	Low	None	N

Notes: IOP – Inventory Observation Point; KOP – Key Observation Point; VRI – Visual Resource Inventory; VRM – Visual Resource Management; SRBOP – Morley Nelson Snake River Birds of Prey National Conservation Area

Appendix K

Appendix K

Compensatory Mitigation for Raptor Habitat in the Morley Nelson Snake River Birds of Prey National Conservation Area: Methods and Conceptual Model Example

1 INTRODUCTION

Congress established the Morley Nelson Snake River Birds of Prey National Conservation Area (SRBOP) in part "to provide for the conservation, protection, and enhancement of raptor populations and habitats and the natural and environmental resources and values associated therewith, and of the scientific, cultural, and educational resources and values of the public lands in the conservation area" (Section 3(a)(2) of P.L. 103-64 [1993]). Therefore, the BLM must demonstrate that the proposed right-of-way (ROW) for the Gateway West Transmission Line Project (Project), which would use portions of the SRBOP if approved, would meet the established purposes of the SRBOP, especially the protection and enhancement of identified SRBOP resources and values.

Other federal policies mandate that mitigation be implemented to offset impacts incurred within the SRBOP. These include: 1) the Presidential Memorandum of November 3, 2015; 2) Department of the Interior Manual 600 DM 6; and 3) the BLM Interim Mitigation Policy (2013-WO-IM-142).

- The November 3, 2015, Presidential Memorandum *Mitigating Impacts on Natural Resources from Development and Encouraging Related Private Investment* (80 Federal Register 68743) directs agencies to implement landscape-scale mitigation for project development impacts. The Memorandum states that "Agencies' mitigation policies should establish a net benefit goal or, at a minimum, a no net loss goal for natural resources the agency manages that are important, scarce, or sensitive, or wherever doing so is consistent with agency mission and established natural resource objectives." In addition, it states that mitigation "occurs through policies that direct the planning necessary to address the harmful impacts on natural resources by avoiding and minimizing impacts, then compensating for impacts that do occur."
- In October 2015, the Department of the Interior released Manual 600 DM 6: "Implementing Mitigation at the Landscape-scale" (DOI 2015), which implements landscape-scale mitigation for impacts from projects. The mitigation guidance states that "compensatory mitigation means to compensate for remaining unavoidable impacts after all appropriate and practicable avoidance and minimization measures have been applied, by replacing or providing substitute resources, or environments."
- The BLM Interim Mitigation Policy (2013-WO-IM-142) states that the BLM will identify, analyze and require compensatory mitigation, as appropriate, to address reasonably foreseeable residual effects from land use activities to resources, values, and functions.

Idaho Power and Rocky Mountain Power (the Proponents) developed a Mitigation and Enhancement Portfolio (MEP) as part of the Proposed Action (Appendix C to this document), which is intended to offset impacts to and enhance resources and values found in the SRBOP. The MEP proposes measures to address the effects that persist

after all appropriate and practicable avoidance and minimization measures have been applied to return an impacted area to baseline conditions, such as 1) habitat restoration, 2) purchasing private inholdings within the SRBOP, 3) added funding of law enforcement, 4) funding for visitor services, and 5) removal of some existing powerlines in the SRBOP.

The lack of details or specifics in the MEP makes it unclear how the proposal's goals would be achieved. Most importantly, the MEP does not contain a methodology and a reliable, consistent, and repeatable accounting system to determine the expected impacts of actions and the measures necessary to compensate for those impacts based on a common "currency" (i.e., raptor habitat value per acre). Therefore, it is not adequate in the form submitted as part of the Revised Plan of Development for the Project.

To address this deficiency, the BLM has developed a model compensatory mitigation accounting system that can be used to assess impacts to raptor habitat in the SRBOP. Raptor habitat is assumed to be a suitable surrogate for assessing adverse impacts (i.e., debits) and beneficial effects (i.e., credits) to raptor populations. The methods described in this Appendix and demonstrated in the conceptual model would determine compensatory mitigation debits and credits for any authorization that impacts raptor habitat in the SRBOP. If an action alternative is selected in the Final SEIS, the BLM will fully apply compensatory mitigation analysis to the selected route alignments and present that analysis and the appropriate calculations in the Final SEIS. The model may also be revised or refined between the Draft and Final SEIS based on feedback received on the Draft SEIS.

These methods apply only to compensatory mitigation for raptor habitat in the SRBOP. Other impacts to resources that warrant compensatory mitigation are addressed in other sections of this Draft SEIS and/or the original 2013 Final EIS for the Gateway West project (e.g., Greater sage-grouse compensatory mitigation in Final EIS Appendix C).

2 MANAGEMENT OBJECTIVES AND GOALS FOR THE SRBOP

The Resource Management Plan (RMP) for the SRBOP emphasizes the restoration and rehabilitation of all areas outside the Idaho Army National Guard Orchard Combat Training Area to bring raptor populations and habitat to more desirable conditions. The RMP identifies appropriate management actions to avoid or minimize environmental impacts where practicable, while meeting the purposes for which the SRBOP was established. The RMP states that mitigation may also be developed during site-specific activity and project-level analysis to meet management direction for the SRBOP. This direction includes:

- Protecting remaining shrub communities,
- Restoring shrub habitat,
- Completing fuels management projects,
- Designating rights-of-way and energy corridors, and

- Managing visual resources.

Three Management Areas (MAs) and corresponding Desired Future Conditions (DFCs) for vegetation are designated and prioritized in the RMP. The MAs identify locations where specific management actions, including rehabilitation and fire suppression, are prioritized based on ecological resiliency and function to achieve highest restoration potential and fire management priority.

- MA 1 is composed of sagebrush and salt desert shrub communities, and is identified in the RMP as the area within the SRBOP most resistant and resilient to disturbance with the highest probability of restoration success (BLM 2008).
- Areas designated as MA 2 still contain habitat structure (e.g., shrub communities) that provide some habitat connectivity value for supporting a raptor prey base, but to a lesser extent than what is found in MA 1.
- MA 3 is managed at a lower priority level than MA 1 or 2 due to almost complete loss of shrub structure and the associated lack of ecological resilience and resistance of the current plant communities.

Table 1. Vegetation Community Condition Classes and Relative Raptor Habitat Value

Condition Class	Canopy Cover of Primary Components (%)			Habitat Value
	Sage-brush	Invasive Annual Grass	Other	
Ecological Potential (EP)	≥ 15	< 50	native perennial grass > seeding	1.0
Early-seral Native Shrubland/Grassland (NSG)	< 15	< 50	native perennial grass > seeding	0.8
Shrublands/Invasive Annual Grasses (SX)	≥ 5	≥ 50	NA	0.6
Non-native Seeding (NNS)	< 15	< 50	seeding > native perennial grass	0.4
Invasive Annual Grassland/Forbs (X)	< 5	≥ 50	NA	0.2
Facility/Developed Sites	0	0	NA	0.0

Table 1 shows the various condition classes for vegetation communities found in the SRBOP. The DFC of MA 1 is a mosaic of multi-aged shrubs, forbs, and native and adapted non-native perennial grasses (i.e., Ecological Potential [EP]). Although this DFC is synonymous with the highest-valued raptor habitat, other condition classes provide *suitable* raptor habitat (i.e., grass-dominated native shrubland/grassland [NSG]) or *adequate* raptor habitat (i.e., multi-aged shrubland with an invasive grass understory [SX]) due to the community's increased ability to move to a higher condition class (via the restoration pathways shown in Figure E) or remaining vegetative structure.

3 COMPENSATORY MITIGATION FRAMEWORK

Mitigation Standard for the SRBOP

The overall credits from compensatory mitigation must exceed the overall debits of the Project to result in enhancement (i.e., net benefit) to SRBOP raptor populations and habitats (see Section 3.1 below for Calculation of Baseline). Enhancement is defined as an improvement over current baseline conditions.

Compensatory Mitigation Measures

Habitat restoration treatments are the primary compensatory mitigation the BLM will require to address impacts from the construction of Gateway West to SRBOP raptor populations and habitats.

Siting Compensatory Mitigation

Habitat restoration treatments would primarily be conducted within MA 1 because the RMP identifies this area as having the highest probability of restoration success (BLM 2008). The method assumes that the EP of an area is specific to the Ecological Site Descriptions (ESDs) of the vegetation community.

In addition, habitat restoration treatments would be located within fuel break compartments that contain a gradient of the raptor habitat condition classes described in Table 1. Fuel breaks will compartmentalize habitat restoration areas to provide durability for treatments.

Restoration treatment areas within MA 1 will be defined and prioritized, based on:

1. where treatments would provide the best connectivity between existing shrub communities;
2. where perennial native and non-native vegetation (seedings) exist and provide stable ecological conditions that facilitate restoration success;
3. where existing ongoing restoration and research demonstration projects can continue to be leveraged; and,
4. where sites have the ability to achieve EP or NSG (i.e., DFCs for SRBOP raptor habitat).

It should be noted that, depending on initial condition class, it may take multiple treatments to achieve DFC for raptor habitat (Figure E). In addition, the entire SRBOP is a finite area, and areas identified for restoration treatments will be further bounded to ensure a relationship between Project impacts and mitigation measures. All compensatory mitigation measures must be durable for the duration of the Project impacts, and thus provide benefit to SRBOP raptor populations and habitats for that duration.

3.1 Mechanics of the Model

Calculating Current Baseline

One method for establishing a baseline for SRBOP raptor habitat is to assign values to vegetation community condition classes based on the services and functions they provide as habitat for raptors and raptor prey. For this example, one of five condition classes (Table 1) is assigned to each acre within the analysis area. Each condition class carries a habitat value between 0 and 1. When considered cumulatively, a mean per-acre habitat value can be calculated for the area and impacts (i.e., debits) and offsets (i.e., credits) assessed for habitat loss and restoration treatments, respectively. The mean SRBOP habitat value for an analysis area is calculated by averaging the habitat values of each acre within the analysis area. The resulting mean habitat value would represent the current baseline before Project impacts.

Calculating Debits

The construction, operation and maintenance of the Gateway West Project would result in complete loss and degradation of SRBOP raptor habitats at locations where facilities are sited and construction areas surrounding these facilities, which generally would be cleared of vegetation during construction. Some of these construction areas would be restored over time to EP, while other areas immediately surrounding facilities would be periodically re-disturbed or maintained in a condition class with relatively lower habitat value (e.g., NSG or NNS). These areas may continue to experience ongoing disturbance during operation but could also retain some raptor habitat component. A minor subset of the Project's overall disturbances would result in complete loss of habitat value; within the SRBOP this would mostly be limited to the footprint of individual facilities.

3.2 Conceptual Model Example: Mitigation Calculations for Impacts Resulting in Complete Loss of Habitat within Management Area 1

The following example uses the model method to calculate the debits and required credits (i.e., the mitigation requirements) related to impacts of a hypothetical project sited within MA 1 for acres with a complete loss of habitat (i.e., mitigation to compensate for the Project's permanent footprint). Similar but modified methods would be used for the other impacts (i.e., temporary, non-periodic and temporary, periodic impacts) in MA 1, as well as all impacts in MA 2 and MA 3.

Calculation of Existing Baseline Condition

First, assume that each cell in Figure 1 represents one acre of a Wyoming Big Sagebrush habitat of varying condition classes, each of which has a different potential restoration pathway (as shown in Figure E). The example area (Figure A) has a finite area of 30 acres (A1) that contain a variety of condition classes with different habitat values (A2). The mean value of the raptor habitat in this area is **0.57/acre** (A3).

Figure A. Existing Baseline Condition

EP (1.0)	EP (1.0)	EP (1.0)	NSG (0.8)	SX (0.6)
EP (1.0)	EP (1.0)	EP (1.0)	SX (0.6)	X (0.2)
EP (1.0)	EP (1.0)	SX (0.6)	NNS (0.4)	X (0.2)
NSG (0.8)	NNS (0.4)	NSG (0.8)	X (0.2)	X (0.2)
X (0.2)	X (0.2)	X (0.2)	SX (0.6)	SX (0.6)
X (0.2)	X (0.2)	X (0.2)	SX (0.6)	NNS (0.4)

A1). 30 acre area of Wyoming Big Sagebrush Ecological Site
A2). EP: 8*1.0 = 8.0; NSG: 3*0.8 = 2.4; SX: 6*0.6 = 3.6; NNS: 3*0.4 = 1.2; X: 10*0.2 = 2.0
A3). Mean habitat condition value = (8.0+2.4+3.6+1.2+2.0) = 17.2/30 acres = **0.57/acre**

Calculation of Debits for Permanent Project Impacts

Figure B displays the effects of the hypothetical project consisting of components that result in a complete loss of 5 acres of habitat (e.g., conversion of habitat to permanent facility footprint; red rectangles in Figure B). In this example, habitat loss within the area would last for the life of the project (i.e., a permanent impact; B1), and the BLM would permanently lose the ability to restore the impacted acres to their EP (as per RMP Objectives and Management Actions, BLM 2008). The habitat values for each of the lost acres would be reduced to 0, and consequently, the resulting mean habitat value is reduced to **0.49/acres** (B2 and B3).

Figure B. Debits for Permanent Project Impacts

EP (1.0)	EP (1.0)	EP (1.0)	NSG (0.8)	SX (0.6)
EP (1.0)	EP (1.0)	EP (1.0)	SX (0.6)	X (0.2)
EP (1.0)	EP (1.0)	SX (0.6)	NNS (0.4)	X (0.2)
NSG (0.0)	**NNS (0.0)**	**NSG (0.0)**	**X (0.0)**	**X (0.0)**
X (0.2)	X (0.2)	X (0.2)	SX (0.6)	SX (0.6)
X (0.2)	X (0.2)	X (0.2)	SX (0.6)	NNS (0.4)

B1). Permanent loss of 5 ac of EP potential (red rectangles)
B2). EP: 8*1.0 = 8.0; NSG: 1*0.8 = 0.8; SX: 6*0.6 = 3.6; NNS: 2*0.4 = 0.8; X: 8*0.2 = 1.6
B3). Mean habitat condition value = (8.0+0.8+3.6+0.8+1.6) = 14.8/30 acres = **0.49/acre**

Calculation of Credits for Habitat Restoration Treatments

To return the area to the mean habitat value that existed at baseline, habitat restoration treatments would be required (see Figure C). In the first step, 5 acres at other locations within the affected area (green rectangles in Figure C) would be treated to mitigate the lost habitat value and compensate for the lost opportunity to restore the developed acres to their EP (C1). Habitat values for each treated acre would increase to 1.0 (i.e., the EP; C2). As a result, mean habitat value would increase to **0.55/acre** (C3); however, this would still be below the baseline of **0.57/acre**.

Figure C. Credits for Initial Habitat Restoration Actions

EP (1.0)	EP (1.0)	EP (1.0)	**NSG→EP** (1.0)	**SX→EP** (1.0)
EP (1.0)	EP (1.0)	EP (1.0)	**SX→EP** (1.0)	X (0.2)
EP (1.0)	EP (1.0)	**SX→EP** (1.0)	NNS (0.4)	X (0.2)
NSG (0.0)	NNS (0.0)	NSG (0.0)	X (0.0)	X (0.0)
X (0.2)	X (0.2)	X (0.2)	SX (0.6)	**SX→EP** (1.0)
X (0.2)	X (0.2)	X (0.2)	SX (0.6)	NNS (0.4)

C1). Treat 5 ac to replace lost opportunity to restore 5 ac to EP potential at developed sites
C2). EP: 13*1.0 = 13.0; NSG: 0*0.8 = 0; SX: 2*0.6 = 1.2; NNS: 2*0.4 = 0.8; X: 8*0.2 = 1.6
C3). Mean habitat condition value = (13.0+0+1.2+0.8+1.6) = 16.6/30 acres = **0.55/acre**

Credits for Additional Habitat Restoration Actions

Because the mean habitat value following the initial step would remain below the baseline (i.e., **0.55/acre** after mitigation treatments <**0.57/acre** at baseline), additional acres would need to be treated (Figure D). One approach that could be used to equal or exceed baseline conditions (i.e., increase habitat values) would be treating additional acres to attain DFC for raptor habitat (orange rectangles in Figure D; D1).

In practice, SX (Shrublands/Invasive Annual Grasses) is not a target DFC for habitat restoration treatments. However, SX does provide better structure, and therefore better raptor habitat, than NNS (Non-native Seeding). In turn, although NNS is more desirable for long-term soil stabilization and reduced fire risk than X (Invasive Annual Grassland/ Forbs), NNS is also not a DFC for SRBOP raptor habitat (i.e., the focus of habitat management objectives and actions in MA 1).

However, if the existing condition of SX acres not treated in the first step (C1) were replaced at additional treatment sites to condition classes that would provide DFC for raptor habitat (i.e., EP or NSG; D2), the resulting mean habitat values would increase to **0.64/acre** (D3), which would exceed the baseline mean habitat value (A3).

Figure D. Credits for Additional Habitat Restoration Actions

EP (1.0)	EP (1.0)	EP (1.0)	NSG→EP (1.0)	SX→EP (1.0)
EP (1.0)	EP (1.0)	EP (1.0)	SX→EP (1.0)	**X→NSG** (0.8)
EP (1.0)	EP (1.0)	SX→EP (1.0)	**NNS→EP** (1.0)	X (0.2)
NSG (0.0)	NNS (0.0)	NSG (0.0)	X (0.0)	X (0.0)
X (0.2)	X (0.2)	X (0.2)	**SX→EP** (1.0)	SX→EP (1.0)
X (0.2)	X (0.2)	X (0.2)	**SX→EP** (1.0)	**NNS→EP** (1.0)

D1). Treat 5 ac to replace loss of 5 ac of Existing Condition (or DFC) at Treatment Sites
D2). EP: 17*1.0 = 17.0; NSG: 1*0.8 = 0.8; SX: 0*0.6 = 0; NNS: 0*0.4 = 0; X: 7*0.2 = 1.4
D3). Mean condition value = (17.0+0.8+0+0+1.4) = 19.2/30 acres = **0.64/acre**

Any number of alternative scenarios to achieve mean baseline conditions could be substituted for or added to the additional credit step in Figure D, on the condition that treated acres end up in a DFC for SRBOP raptor habitat. Figure E shows various potential pathways for restoration to DFC.

Conceptual Model Example Summary

This model establishes a logical and transparent approach to assessing baseline conditions as they apply to raptor habitat within the finite area of the SRBOP and provides a simple method for calculating the mitigation required to achieve a return to or exceedance of baseline raptor habitat conditions in the SRBOP, using flexible habitat restoration treatments.

The most important and primary point of the example presented is that returning to baseline conditions requires a habitat restoration ratio greater than 1:1.

General guidelines for habitat restoration treatments that return to or exceed mean baseline conditions include:

- Habitat restoration treatment sites should be prioritized by ability to achieve EP or DFC for raptor habitat.
- Loss of the possibility to achieve EP at permanent impact sites (i.e., Project footprint) should be compensated by uplifting vegetation conditions to EP at additional habitat restoration treatment sites.
- Loss of existing condition at habitat restoration treatment sites could be compensated by uplifting vegetation conditions to DFC for SRBOP raptor habitat (i.e., EP or NSG) at additional habitat restoration treatment sites.

Additional Considerations for Compensatory Mitigation

The risk of failure of habitat restoration treatments will be accounted for in two ways:

1. The party responsible for the habitat restoration treatments (i.e., proponent) will be required to achieve the outcome (i.e., a specific habitat condition class), as opposed to specific amount of output;
2. The BLM will adjust the acreage of required habitat restoration treatments to account for the potential failure to achieve improved raptor habitat outcomes.

All compensatory mitigation measures will be managed adaptively to achieve their required outcomes, based on required monitoring and reporting.

Finally, any time lag between the onset of impacts from the Project and the achievement of compensatory mitigation outcomes will also be accounted for by adjusting the acreage of habitat restoration treatments.

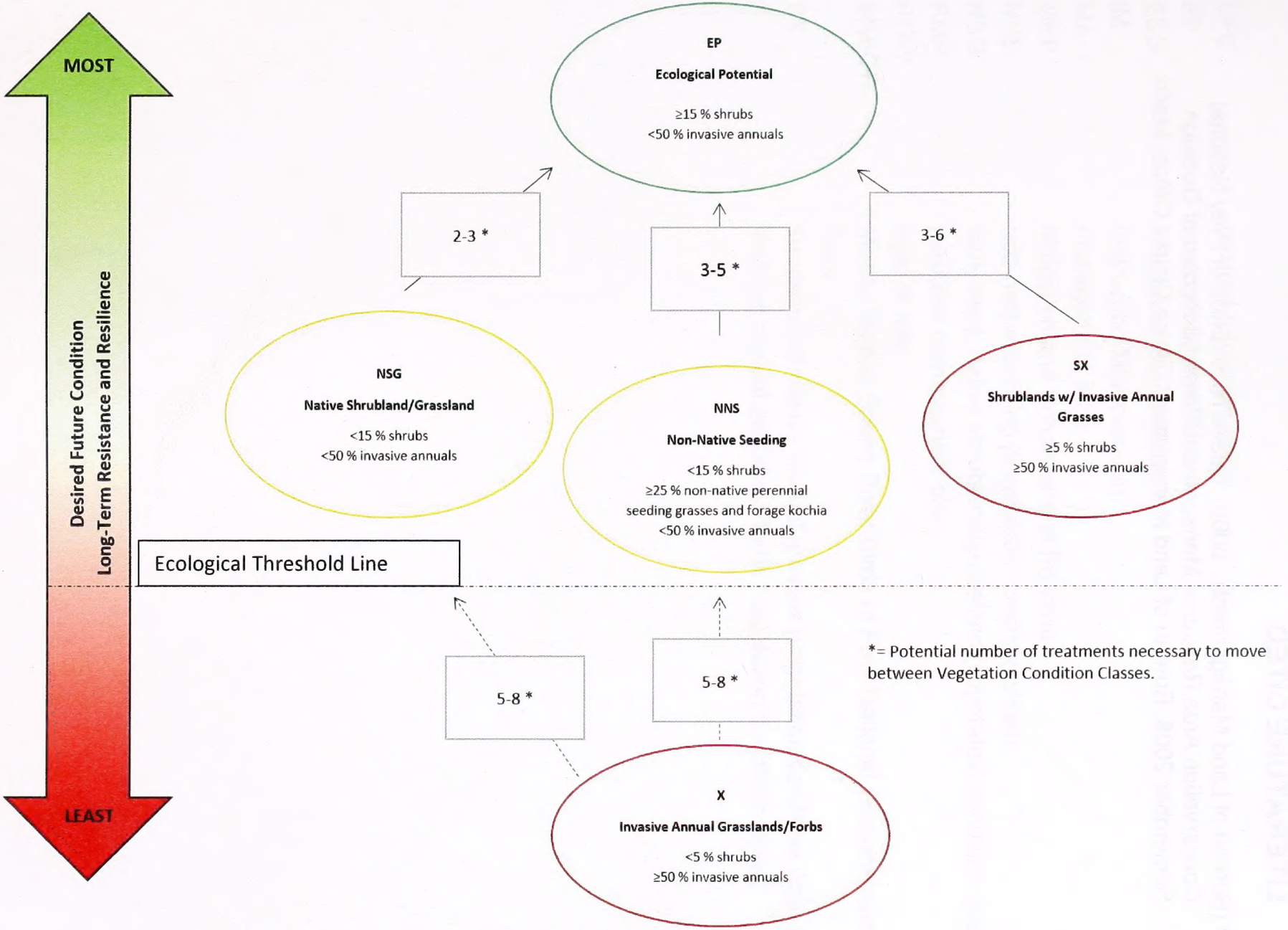

Figure E. Raptor habitat condition classes: Pathways and estimated number of required restoration treatments

4 LITERATURE CITED

BLM (Bureau of Land Management). 2008. Snake River Birds of Prey National Conservation Area Resource Management Plan and Record of Decision. September 2008. Bureau of Land Management, Boise District Office, Idaho.

Acronyms and Abbreviations

DFC	desired future condition
EP	ecological potential
ESD	ecological site description
IM	Instruction Memorandum
MA	management area
MEP	Mitigation and Enhancement Portfolio
NNS	non-native seeding [vegetation condition class]
NSG	early-seral native shrubland/grassland [vegetation condition class]
RMP	resource management plan
ROW	right of way
SRBOP	Morley Nelson Snake River Birds of Prey National Conservation Area
SX	shrublands/invasive annual grasses [vegetation condition class]
X	invasive annual grassland/forbs [vegetation condition class]